Guildford borough Submission
Local Plan: strategy and sites

Regulation 19 consultation representations
(ordered by respondent ID number)

December 2017

Document 8 of 10
Respondent ID numbers 15496001 to 15599329
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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPA16/2550   Respondent: 15496001 / Ryan Hookind   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): ()

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: PSLPS16/5192   Respondent: 15496001 / Ryan Hookind   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 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: PSLPS16/5135   Respondent: 15496001 / Ryan Hookind   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 Green Belt.

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

Attached documents:

Comment ID: PSLPS16/4890  Respondent: 15496001 / Ryan Hookind  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: PSLPS16/4973  Respondent: 15496001 / Ryan Hookind  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: PSLPS16/5079  Respondent: 15496001 / Ryan Hookind  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: PSLPS16/5012  Respondent: 15496001 / Ryan Hookind  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: PSLPP16/10343  Respondent: 15496001 / Ryan Hookind  Agent:

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

Do you consider this section of the document; complies 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?
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:

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?

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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): ()

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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Do you consider this section of 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?

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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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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: PSLPS16/4891  Respondent: 15496033 / Sophie Hart  Agent:

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

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

I OBJECT to the inclusion of 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.

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Attached documents:

Comment ID: PSLPS16/4975  Respondent: 15496033 / Sophie Hart  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 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:** PSLPS16/5082  **Respondent:** 15496033 / Sophie Hart  **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:** PSLPS16/5013  **Respondent:** 15496033 / Sophie Hart  **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:** PSLPP16/10344  **Respondent:** 15496033 / Sophie Hart  **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: PSLPP16/10430  Respondent: 15496033 / Sophie Hart  Agent:

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

Do you consider this section of 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: PSLPA16/2426  Respondent: 15496129 / Ella Doyle  Agent:

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

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

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

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

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

Attached documents:

Comment ID: PSLPS16/4780  Respondent: 15496129 / Ella Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

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

Attached documents:

Comment ID: PSLPS16/4781  Respondent: 15496129 / Ella Doyle  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: PSLPS16/4782  Respondent: 15496129 / Ella Doyle  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: PSLPS16/4783  Respondent: 15496129 / Ella Doyle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

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

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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

Attached documents:

Comment ID: PSLPS16/4784  Respondent: 15496129 / Ella Doyle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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

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

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

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

Attached documents:

Comment ID: PSLPS16/4785  Respondent: 15496129 / Ella 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? ( )
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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 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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Do you consider this section of the document; complies 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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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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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

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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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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.

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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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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,
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Attached documents:

Comment ID: PSLPS16/4977  Respondent: 15496193 / Oliver Hemmings  Agent:

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

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

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

I object to policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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

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Comment ID: PSLPS16/5083  Respondent: 15496193 / Oliver Hemmings  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: PSLPS16/5014  Respondent: 15496193 / Oliver Hemmings  Agent:

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

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Comment ID: PSLPP16/10345  Respondent: 15496193 / Oliver Hemmings  Agent:

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

I object to all insetting of villages from Green belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

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Comment ID: PSLPP16/10566  Respondent: 15496193 / Oliver Hemmings  Agent:

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

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

Attached documents:

Comment ID: PSLPP16/10104  Respondent: 15496193 / Oliver Hemmings  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: PSLPP16/10429  Respondent: 15496193 / Oliver Hemmings  Agent:

Document: Proposed Submission Local Plan: strategy 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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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: PSLPA16/2546  Respondent: 15496225 / Tasha Hemmings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPS16/5195  Respondent: 15496225 / Tasha Hemmings  Agent:

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

11. 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: PSLPS16/5141  Respondent: 15496225 / Tasha Hemmings  Agent:

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

11. 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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Comment ID: PSLPS16/5021  Respondent: 15496225 / Tasha Hemmings  Agent:

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

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Comment ID: PSLPP16/10346  Respondent: 15496225 / Tasha Hemmings  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: PSLPP16/10576  Respondent: 15496225 / Tasha Hemmings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Comment ID: PSLPP16/10105  Respondent: 15496225 / Tasha Hemmings  Agent:

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

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Comment ID: PSLPP16/10319  Respondent: 15496225 / Tasha Hemmings  Agent:

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

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Comment ID: PSLPP16/10428  Respondent: 15496225 / Tasha Hemmings  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): ()

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

Attached documents:

Comment ID: PSLPA16/2545  Respondent: 15496257 / Charlotte Philipps  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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Attached documents:

Comment ID: PSLPS16/5196  Respondent: 15496257 / Charlotte Philipps  Agent:

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

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Comment ID: PSLPS16/5143  Respondent: 15496257 / Charlotte Philipps  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: PSLPS16/4904  Respondent: 15496257 / Charlotte Philipps  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Attached documents:

Comment ID: PSLPS16/4979  Respondent: 15496257 / Charlotte Philipps  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
| Comment ID: PSLPS16/5088 | Respondent: 15496257 / Charlotte Philipps | Agent: |
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| Comment ID: PSLPS16/5023 | Respondent: 15496257 / Charlotte Philipps | Agent: |
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| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45 |
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| Comment ID: PSLPP16/10347 | Respondent: 15496257 / Charlotte Philipps | Agent: |
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| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57 |
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Comment ID: PSLPP16/10579  Respondent: 15496257 / Charlotte Philipps  Agent:

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

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Comment ID: PSLPP16/10427  Respondent: 15496257 / Charlotte Philipps  Agent:

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

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Attached documents:

Comment ID: PSLPA16/2544  Respondent: 15496289 / W.A. McGregor  Agent:

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

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Comment ID: PSLPS16/5197  Respondent: 15496289 / W.A. McGregor  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: PSLPS16/5144  Respondent: 15496289 / W.A. McGregor  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.

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Attached documents:

Comment ID: PSLPS16/5207  Respondent: 15496289 / W.A. McGregor  Agent:

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

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Comment ID: PSLPS16/4905  Respondent: 15496289 / W.A. McGregor  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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Comment ID: PSLPS16/4980  Respondent: 15496289 / W.A. McGregor  Agent:

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

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Comment ID: PSLPS16/5089  Respondent: 15496289 / W.A. McGregor  Agent:

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

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Comment ID: PSLPS16/5026  Respondent: 15496289 / W.A. McGregor  Agent:

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

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Comment ID: PSLPP16/10348  Respondent: 15496289 / W.A. McGregor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10581  Respondent: 15496289 / W.A. McGregor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Whilst I do not live in the borough of Guildford I do none the less have a very deep interest in the area as I live on the borders and in particular live close to the Wisley site and as a result have an in depth knowledge and respect for this area. I am therefore writing in connection with the above draft local plan to which I wish to express my objections for the following reasons:

- 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. The Green Belt was set up specifically to prevent this kind of urban expansion.
- 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 (SNCl).
• 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?**

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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: PSLPS16/4930  Respondent: 15496353 / P.J. McGregor  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.

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Comment ID: PSLPS16/5055  Respondent: 15496353 / P.J. McGregor  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.

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Comment ID: PSLPS16/4982  Respondent: 15496353 / P.J. McGregor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
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Attached documents:
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Comment ID: PSLPP16/10485  Respondent: 15496353 / P.J. McGregor  Agent:

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

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Attached documents:

Comment ID: PSLPP16/10109  Respondent: 15496353 / P.J. McGregor  Agent:

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

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Attached documents:

Comment ID: PSLPP16/10462  Respondent: 15496353 / P.J. McGregor  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): ()

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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: PSLPS16/4938  Respondent: 15496385 / Paul Bold  Agent:

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

Attached documents:

Comment ID: PSLPS16/5057  Respondent: 15496385 / Paul Bold  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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Attached documents:

Comment ID: PSLPP16/10459  Respondent: 15496385 / Paul Bold  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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: PSLPS16/4809  Respondent: 15496417 / James McKinnon  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

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

We wish to record our objection to the inclusion in the Guildford Borough Council draft Local Plan (June 2016) of the former Wisley Airfield as a potential development site. This site is Green Belt land and there is no need for its development as there are brownfield sites in urban areas that could be regenerated.

A development of 2,000 dwellings would have a significant effect on the surrounding villages, towns and roads. We live in Cobham and this would be the site’s nearest shopping centre. Cobham is already congested and there is insufficient parking.
The environmental effects of increased traffic have not been given sufficient consideration. Air quality would be affected and this site and areas around it have significant ecological value.

The application no. 15/P/00012 was unanimously rejected by Guildford Council Planning Committee in April 2016 so it is unsettling to see the site included in the Draft Plan.

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

**Attached documents:**

<table>
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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:**

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Page 42 of 1920
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Attached documents:

Comment ID: PSLPP16/10460  Respondent: 15496481 / R Frampton  Agent:

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

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Attached documents:

Comment ID: PSLPA16/2432  Respondent: 15496513 / Paul Houghton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / 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 would like to submit some general comments on the local plan:

1. Jacobs Well greenbelt - I object to Jacobs Well and Blanchards Hill being removed from the greenbelt with the resulting presumption in favour of building houses. Firstly, the rural character of the area will be ruined by the removal of the surrounding fields and green areas.
2. Secondly, the area is not well equipped infrastructure wise to deal with the increased traffic and people that increased housing would lead to. Clay Lane, Jacobs Well Road and Blanchards Hill are already extremely busy roads. Blanchards Hill has no footpath and is 40mph making it dangerous for there to be further traffic and pedestrians. Although if it is removed from the green belt then I would expect the road safety to be investigated and a 30mph limit put in place along the road as per most residential non green belt roads.
3. I also object to infilling and adding houses to the Jacobs Well village when there is no other infrastructure to support this. It is already the case that living on Blanchards Hill we cannot be certain of which primary or secondary school our child would be able to attend and this uncertainty would only increase if further houses were to be built. In general if more houses are to be built across the borough then schools designed for the
villages (inset or not) need to be built or existing nearby schools expanded. For example, our nearest primary school is Burpham at 0.9 miles but we are highly unlikely to receive a place and children from Jacobs Well village are forced to go to schools all over Guildford which is unacceptable and difficult for working parents. For secondary school the rules are even more ludicrous as the existence of a relatively small Church of England school, Christs College, as our nearest school, which takes 50% of christian faith and then children from several feeder schools first means that our child cannot reasonably be likely to be offered a place at this school in most if not all years. However the "nearest school" criteria used by most other schools (for example our second nearest, George Abbott) then means that we would not get into another nearby school either. Therefore until the schools situation for villages like Jacobs Well is fixed or the local schools are forced to change their admittance criteria so as to cater for people in such villages without them being left to have a place in whichever dire school still has places left each year, then I do not think that further houses should be built in such areas.

4. There are also no other facilities in Jacobs Well such as doctors etc.

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

Attached documents:

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Clay Lane link road

I object to the building of the clay lane link road from Slyfield to Clay Lane. I have previously provided detailed reasons why I object to this but briefly, Clay lane, Blanchards Hill and other local roads are already very busy and dangerous, particularly at rush hour. Blanchards Hill is a rural road with no footpath and would be particularly more dangerous if traffic was to increase. A lot of the houses along all roads are very close to the road and therefore resulting increase in heavy traffic would be detrimental to the buildings as well as causing disruption to the inhabitants. It would also ruin the nature of the area by making it a busy thoroughfare rather than a village where people live.

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

Attached documents:
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:

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Comment ID: PSLPS16/5174  Respondent: 15496545 / Gillian Frampton  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:

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Comment ID: PSLPS16/5113  Respondent: 15496545 / Gillian Frampton  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:

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Comment ID: PSLPS16/4850  Respondent: 15496545 / Gillian Frampton  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: PSLPS16/4939  Respondent: 15496545 / Gillian Frampton  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: PSLPS16/5058  Respondent: 15496545 / Gillian Frampton  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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Do you consider this section of the document; complies with 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?

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Do you consider this section of the document; complies 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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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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Comment ID: PSLPP16/10114  Respondent: 15496545 / Gillian Frampton  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:

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Comment ID: PSLPP16/10458  Respondent: 15496545 / Gillian Frampton  Agent:

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

Do you consider this section of 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?

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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 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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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 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:** PSLPS16/4815  **Respondent:** 15496609 / Dena 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): ()**

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:** PSLPP16/10118  **Respondent:** 15496609 / Dena 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 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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<td>I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency</td>
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<td><strong>Document:</strong></td>
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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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I chose to live here because it is a village.

Wisley airfield? Well we are back to URBAN SPRALL again, again, again!

Far too many house because we all know that the house will be built because there is profit in them for the developers but the schools, medical facilities will be quietly put on the back boiler & conveniently forgotten.

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

Attached documents:

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Station Parade serves the village very well - village being the OPERATIVE word.

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): ()

East & West Horsley are two very different villages Long may they remain so Yes we do need more houses but the local infrastructure is already overloaded - more houses mean more people thus more pressure on the overloaded infrastructure. More thought should be given to this problem. But it never is.

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

Attached documents:

Comment ID: PSLPP16/10120  Respondent: 15496897 / Iris Watts  Agent:

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

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

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

Hands off the Green Belt
It was introduced to prevent Britain becoming an URBAN SPRALL!!!!

It is even more relevant today

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

Attached documents:

Comment ID: PSLPA16/2557  Respondent: 15496929 / M Cozens  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): ()
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: PSLPS16/5182  Respondent: 15496929 / M Cozens  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: PSLPS16/5118  Respondent: 15496929 / M Cozens  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: PSLPS16/4864  Respondent: 15496929 / M Cozens  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: PSLPS16/5061  Respondent: 15496929 / M Cozens  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: PSLPS16/4987  Respondent: 15496929 / M Cozens  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: PSLPP16/10330  Respondent: 15496929 / M 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): ()

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: PSLPP16/10531  Respondent: 15496929 / M 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): ()

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: PSLPP16/10122  Respondent: 15496929 / M Cozens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
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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:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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9. I object to the 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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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>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</td>
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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 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</td>
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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?

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

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

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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

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Do you consider this section of the document; complies with 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?

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<td>I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency</td>
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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): ()

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: PSLPP16/10130  Respondent: 15496961 / Felix Jeffreson  Agent:

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

Do you consider this section of the document; complies with 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: PSLPA16/2562  Respondent: 15496993 / nigel stirraker  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: PSLPS16/5178  Respondent: 15496993 / nigel stirraker  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: PSLPS16/5115  Respondent: 15496993 / nigel stirraker  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: PSLPS16/4862  Respondent: 15496993 / nigel stirraker  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? ( )

Page 64 of 1920
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: PSLPS16/4948  Respondent: 15496993 / nigel stirraker  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: PSLPS16/5060  Respondent: 15496993 / nigel stirraker  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: PSLPS16/4986  Respondent: 15496993 / nigel stirraker  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: PSLPP16/10329  Respondent: 15496993 / nigel stirraker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/10475  Respondent: 15496993 / nigel stirraker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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: PSLPP16/10124  Respondent: 15496993 / nigel stirraker  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: PSLPP16/10465  Respondent: 15496993 / nigel stirraker  Agent:

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

Do you consider this section of 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?

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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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Do you consider this section of the 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 take this opportunity to express my views of your proposed developments in the village in which I live (West Horsley) and it's surrounding areas.

I, like many other villagers moved here (30 years ago) deliberately because of the green belt and the village settings. Over the years I have seen modernisations and developments of the area but I feel extremely strongly about this latest proposed plan due to its size - East & West Horsley and the other villages detailed in your scheme would become more like towns than villages without adequate infra structure in place nor the ability to extend or develop the necessary infra structure to meet the proposed requirements. The effect on the roads - lots of them currently in poor condition with pot holes therefore the impact of heavy machinery to construct the developments alone would be extremely detrimental to the roads, then combine this with the extra traffic long term due to volume of people, would create chaos especially in current bottle necks, created by previous expansion, at peak times especially. The roads around the villages are narrow and many of them built up on either side yet some of the developments in the proposed plan intend to increase traffic on these, turning them into main thoroughfares as opposed to the country lanes to gain access only to the houses they were constructed for and in some instances with a knock on effect on roads adopted by the residents; totally unacceptable!. The safety of drivers, pedestrians and cyclist will be put at risk due to the proposed volume of vehicles - some roads have no pavements, the bends in the roads make it hazardous as it is for drivers and cyclist alike (whose numbers have hugely increased, more so recently, if these developments go ahead it will be an accident waiting to happen. Rarely a day goes by now without hearing one of the emergency services dashing along the A246 this has only come about in recent years due to the increases of population. Some of the sites chosen for development are on busy bends and even of the approaches are not directly on these bends they will clog up the narrow village roads leading up to them!

The schools are already enlarging their buildings to accommodated expected increases in current numbers and their sites are restricted to how much if any further development would be possible. The village school has been sold for housing in the past so even this will not be an option for taking some year groups of pupils. The entrances to both the Raleigh and The Howard of Effingham are in a built up area that currently struggles to cope with the increased volume!

As for the knock on effect on the other amenities/services such as the Doctors surgeries, shops, library, car parking to enable use of the amenities, railway travel and utilities it will be put a tremendous strain on already overburdened services.

I would therefore request that the proposed plans for the villages are carefully reconsidered for the above mentioned reasons and would ask that the nature of our chosen villages are not allowed to be destroyed/changed for ever.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4817</th>
<th>Respondent: 15497025 / Hartley Bishop</th>
<th>Agent:</th>
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<tbody>
<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? ( )
Whilst the proposal for 2000 houses at Wisley does not directly affect Horsley residents, it will surely increase traffic through the Horsleys and therefore the A3 and A246, both of which suffer regular congestion.

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

Attached documents:

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My main concern is the impact that such a considerable increase in housing will have on the roads around the villages of East and West Horsley and Ockham. The roads, frequently narrow and already poorly maintained will become much more congested. Cyclists (encouraged to use the local roads by SCC and GBC) and pedestrians will surely be put at risk.

Parking is very limited at Horsley Railway Station and Bus Services are unlikely to be increased to accommodate such a large increase in population.

The proposed developments will surely place a great strain on schooling. Even if extra places can be found at local schools on their small sites there will again be problems accessing the sites.

Clearly I have not been made aware of all the detailed plans for local amenities and services but it is impossible to believe that sewage, telephone, medical, libraries, broadband, shops and policing will be increased to a level that can sustain such a large increase in population. Indeed, many of these services have been reduced in recent years.

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

Attached documents:
Whilst there may well be a need for some increase in housing within the area, the sites chosen for discussion and the number of houses proposed seems to be ill considered. Thatcher’s Hotel and Bell and Colvill sites seem particularly inappropriate given they are already bottlenecks. Others are sited on minor roads.

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

Attached documents:

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**Comment ID:** SQLP16/1313  **Respondent:** 15497025 / Hartley Bishop  **Agent:**

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

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

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

Whilst trying not to be too negative, I find little in the plan to commend it and believe it will have a detrimental effect on this and other nearby communities. In short I ask that the whole plan be re-considered.

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

Attached documents:

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**Comment ID:** PSLPA16/2558  **Respondent:** 15497057 / S McMarken  **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:

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**Comment ID:** PSLPS16/5175  **Respondent:** 15497057 / S McMarken  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
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Do you consider this section of the document; complies with 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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Do you consider this section of the document; complies with 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: PSLPS16/4947  
Respondent: 15497057 / S McMarken  
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: PSLPS16/5059  
Respondent: 15497057 / S McMarken  
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: PSLPS16/4985  
Respondent: 15497057 / S McMarken  
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 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:

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:

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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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?

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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:**

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<th>Comment ID: PSLPA16/2437</th>
<th>Respondent: 15497377 / David Freeborough</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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<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 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</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 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: PSLPS16/4838  Respondent: 15497377 / David Freeborough  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: PSLPS16/4839  Respondent: 15497377 / David Freeborough  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: PSLPS16/4840  Respondent: 15497377 / David Freeborough  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: PSLPS16/4841  Respondent: 15497377 / David Freeborough  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: PSLPP16/10142  Respondent: 15497377 / David Freeborough  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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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

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Do you consider this section of the document; complies 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): ()

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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 S2

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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:

Comment ID: PSLPA16/2441  Respondent: 15497441 / Holly Hicks  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: PSLPS16/4842  Respondent: 15497441 / Holly Hicks  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: PSLPS16/4844  Respondent: 15497441 / Holly Hicks  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: PSLPS16/4845  Respondent: 15497441 / Holly Hicks  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: PSLPS16/4846  Respondent: 15497441 / Holly Hicks  Agent:
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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.

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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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<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 the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>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>
<td></td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
I OBJECT to the 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?

Objections to the Guildford Borough Council Proposed Submission Local Plan (June 2016)

I hereby wish to put forward my sincere objections to Guildford Borough Council’s Draft Local Plan regarding the proposed developments in the village of Send. I believe that this plan is not in compliance with the regulations with which it is required to comply. The proposals with which I object are outlined below followed by my considered reasons for this objection.

<table>
<thead>
<tr>
<th>A42</th>
<th>Clockbarn Nursery, Tannery Lane, Send</th>
<th>Send</th>
<th>Homes (C3)</th>
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<tr>
<td>A43</td>
<td>Land at Garlick's Arch, Send Marsh Burnt Common and Ripley</td>
<td>Send and Lovelace</td>
<td>Homes (C3) and employment floorspace (B1c, B2, B8)</td>
<td>400</td>
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Aside from the obvious issues of destruction of wildlife habitats and decrease of biodiversity if these plans go ahead, the Green Belt land on which these proposed developments are intended to be built is necessary in the protection of identities of small rural villages such as Send. By building so many new houses and industrial premises on this land and adding to urban sprawl, the village of Send will begin to merge more and more with the towns of Woking and Guildford, losing its current charm and negatively impacting the lives of the residents in this area. As Send is a rural village, building new houses in the area will be likely to attract more families which will likely bring at least one-two cars per household, therefore drastically increasing the number of cars on the small local roads. This, coupled with the proposed new slip-roads on and off the A3 and new employment floor space will create more traffic and congestion than the local roads around the village are able to support. The new slip-roads will also add another entrance onto the busy A3, potentially increasing the amount of accidents on this stretch of road, especially at peak times where the A3 is busy enough as it is. Congestion on the local roads is also an issue currently, as are the road surfaces around Send which are already in poor condition. Adding an extra 485-970 plus cars onto this area, not even including those who will be travelling to the new employment space, will considerably worsen both of these issues. These extra cars will also give off more air pollution, which will negatively affect any remaining wildlife that has not already been lost by the reduction of the Green Belt. It is impossible to solve the already prevalent issues regarding the roads by adding more cars into the equation, so therefore these proposed developments are ridiculous, only adding to existing issues without benefitting the community or the environment in the slightest.

It is not only the roads and wildlife that will be negatively affected by the proposed developments but the infrastructure currently in place in the area will not be able to cope with increased strain on their services. As I have already explained, rural villages such as Send attract young families, especially if they are close to large towns, such as Guildford and Woking in this case, which provide good facilities and transport links. The proposed new houses would therefore be a prime location for young families, requiring schools and healthcare and the small village of Send would not be able to withstand the increase in demand of these two primary infrastructures. There is only one primary school and one junior school in Send and these local schools are not large enough to be able to cope with many more students as there simply would not be enough places to be able to accommodate them all. Likewise, The Village’s Medical Centre already struggles with being able to provide enough appointments for the current population of Send; any increase would make it much harder for those who need medical appointments to be able to arrange them. Your proposed developments of 485 homes and the traveller site does not account for these issues and even on the unlikely proviso of there being one resident per new household, this would severely increase the strain on these services, again not benefitting the community in any way. It is for these reasons that I believe these plans to be ill-conceived and I strongly object to the developments.

I hope you will consider my reasons for objection and see that these developments cannot take place.

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

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

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

Attached documents:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

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

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

Attached documents:

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<th>Comment ID: PSLPS16/4964</th>
<th>Respondent: 15497505 / Jyoti Nanda</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 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 13).

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

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

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 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: PSLPS16/4974  Respondent: 15497505 / Jyoti Nanda  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: PSLPP16/10192  Respondent: 15497505 / Jyoti Nanda  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: PSLPP16/10178  Respondent: 15497505 / Jyoti Nanda  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: PSLPP16/10191  Respondent: 15497505 / Jyoti Nanda  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 ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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

Attached documents:

Comment ID: PSLPP16/10222  Respondent: 15497505 / Jyoti Nanda  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/"Disneyficati on". 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.

1. To help make Guildford's river landscape less off-putting and support 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.

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

1. To rule out the redevelopment of scarce rural hotel sites (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?
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, 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:
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, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

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

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

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

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

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

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

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

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: PSLPP16/10209  Respondent: 15497505 / Jyoti Nanda  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): ()

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: PSLPP16/10167  Respondent: 15497505 / Jyoti Nanda  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt (Policy P2)

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

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

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

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

Attached documents:

---

Comment ID: PSLPP16/10177  Respondent: 15497505 / Jyoti Nanda  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 ver 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:** | PSLPP16/10148  | **Respondent:** | 15497505 / Jyoti Nanda  | **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:** | PSLPP16/10159  | **Respondent:** | 15497505 / Jyoti Nanda  | **Agent:** |
|----------------|----------------|----------------|-----------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| **Do you consider this section of the document; complies with 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 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 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 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 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: PSLPA16/2442  Respondent: 15497537 / Caroline Sheppard  Agent:

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

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

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

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

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

Attached documents:

Comment ID: PSLPS16/4856  Respondent: 15497537 / Caroline Sheppard  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: PSLPS16/4857  Respondent: 15497537 / Caroline Sheppard  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: PSLPS16/4858  Respondent: 15497537 / Caroline Sheppard  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: PSLPP16/10154  Respondent: 15497537 / Caroline Sheppard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/10156  Respondent: 15497537 / Caroline Sheppard  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:

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:

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:

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:

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to strongly object to the proposed building of homes on Blackwell Farm, Guildford.

The volume of traffic that these homes will generate will be enormous in an already heavily congested area. On top of that is the dangerous high pollution levels that will result in the extra traffic.

Where and how will the infrastructure be located and supplied? These are services in short supply already.

It may have been more acceptable for a far reduced number somewhere but the fact that Guildford Borough Council is proposing to add 25 percent of its current housing level and 69 percent of that proposed build will be on green belt is outrageous. How convenient that an area that was always deemed an area of outstanding natural beauty is suddenly reclassified so homes can be built on it - very handy! Money is obviously the ruling factor here.

So just in case you are in any doubt I feel very strongly about this and object in the strongest way possible.

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

**Attached documents:**

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Comment ID: PSLPA16/2443  Respondent: 15497601 / Ben Hicks  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: PSLPS16/4860  Respondent: 15497601 / Ben Hicks  Agent:

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

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

---
I OBJECT to 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: PSLPS16/4861  Respondent: 15497601 / Ben Hicks  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: PSLPS16/4863  Respondent: 15497601 / Ben Hicks  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:** PSLPS16/4865  **Respondent:** 15497601 / Ben Hicks  **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:** PSLPS16/4866  **Respondent:** 15497601 / Ben Hicks  **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:** PSLPS16/4867  **Respondent:** 15497601 / Ben Hicks  **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: PSLPP16/10162  Respondent: 15497601 / Ben Hicks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/10164  Respondent: 15497601 / Ben Hicks  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: PSLPP16/10160  Respondent: 15497601 / Ben Hicks  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: PSLPP16/10161  Respondent: 15497601 / Ben Hicks  Agent:

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

Do you consider this section of the document; complies with 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: PSLPP16/10165  Respondent: 15497633 / Diane Nichols  Agent:

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

Do you consider this section of the 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 strongly that the Green belt should be retained and the proposed loss is unreasonable and irreversible.

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

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<td>The vast numbers of new housing planned seem to be disproportionately distributed throughout the borough with over 40% of the number affecting the Burpham side of the town and the A3 between it and the M25.</td>
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<td>Crucially there is no infrastructure or road network that can cope with this number of dwellings. The road situation must be addressed before any planning is passed. The A3 is frequently gridlocked through Guildford and northwards to the M25; extra housing will only exacerbate the situation.</td>
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These comments on the Proposed Local Plan (“the Plan”) are submitted by Wanborough Parish Council. They relate to the proposed developments to provide 1800 homes etc. at Blackwell Farm and 1100 homes etc. on “land to the South of Normandy and North of Flexford”.

Under the Infrastructure Act 2015 the Dept of Transport has published a Road Investment Scheme and we note that this is government funded and “ring-fenced”. However that commitment was made before the vote to leave the European Union and there must be some question as to whether those commitments will still be honoured. Within our area we note that there are three road schemes: 1) To commence in 2015-2020 - upgrade of Junction 10 M25/A3 interchange, and 2) Upgrade M25 to four lanes junctions 10-16, 3) To commence 2020-2025 – improve A3 from A320 to A31 ie through Guildford. It is said that this could involve a tunnel or road widening scheme but is subject to a feasibility study.

Pages 108-114 of the Plan appear to acknowledge that improvements to the A3 must be made before the two developments referred to above can proceed. Can you please confirm that this is the position? If not, we consider that the proposed developments are entirely inappropriate, as the existing road infrastructure cannot cope with present traffic flows, let alone the addition of vehicles from the proposed 2900 new homes.

We note the proposals in respect of Blackwell Farm, including the “Sustainable Movement Corridor” for buses, bikes and pedestrians and a new station by 2018-19. That date looks very optimistic and the station is dependent on funding from Network Rail. Is that funding secure and confirmed?. As for roads, we note that there will be one into Guildford via the Hospital, but the main road access (and in our view a fatal flaw with this proposed development) will be by a junction from the A31 controlled by traffic lights or to quote the Plan “via the existing at a realigned junction of the A31 and the Down Place access road signalised”. The A31 as it approaches the A3 is gridlocked for large parts of each working day from 6 am onwards. Traffic lights and the additional traffic from the proposed Blackwell Farm (and Normandy/Flexford) development would only exacerbate the existing extreme congestion.

We also have considerable concerns in relation to how the proposed Normandy/Flexford development will impact on the road infrastructure. We note the proposed cycleways and “opportunities to improve Wanborough Station”, and that “interventions will be required” to mitigate highway performance issues. We are however very concerned at the lack of any detailed proposals. The reality is that traffic flows through Wanborough and up Wanborough Hill will increase considerably. The junction at the top of Wanborough Hill with the B3000 is already unable to deal with present traffic flows, as is the junction with the B 3000 and the westbound slip road from the A31.

We note from Appendix C that Guildford Station will get improved capacity and interchanges between 2024 and “post plan period”. It appears that these will be delivered between 2018 and 2029 (elsewhere it says 2018/19, see above). What is the timescale and is the funding agreed and secure?

We are also confused by the proposal that the A3 slip roads at Tesco will be widened between 2017 and 2020. How does this fit with the proposal to widen the A3 or put it in a tunnel?

Having given careful consideration to these two proposed developments we are of the firm view that neither of these developments should be given further consideration unless and until viable road and rail transport solutions have been properly planned and full funding put in place.

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 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: PSLPS16/4879  Respondent: 15497761 / N Wadey  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: PSLPS16/4880  Respondent: 15497761 / N Wadey  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: PSLPS16/4883  Respondent: 15497761 / N Wadey  Agent: 

### Comment ID: PSLPS16/4884  **Respondent:** 15497761 / N Wadey  **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: PSLPS16/4886  **Respondent:** 15497761 / N Wadey  **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: PSLPS16/4886  **Respondent:** 15497761 / N Wadey  **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: PSLPS16/4887  Respondent: 15497761 / N Wadey  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: PSLPP16/10183  Respondent: 15497761 / N Wadey  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 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: PSLPP16/10184  Respondent: 15497761 / N Wadey  Agent:

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

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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?

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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:
Guildford Local Plan 2016

Because I am visually impaired I am unable to interact with your online feedback system. Therefore, please accept this written submission containing my general comments on the broad strategy.

1. Just how much green belt do we require for the rejuvenation of our souls? As a keen dog walker I am struck by how under-used our green belt is. Considering there is something like half-a-million people living within 5 miles radius of Guildford it is odd how few people I meet when out with my dog - up St Martha's, the Chantries, or Newlands Corner - with regard to the latter there are more people sitting in cars than out walking. I meet more dog walkers in Sutherland Park than in the previous mentioned beauty spots.

2. There is a large amount of over-rated green belt - more scrubland than stimulating green environment. The quality of green environment matters more than mere quantity. So guard our Surrey Hills with all your might but there is a great deal of so-called boundary or in-between zones that do not constitute stimulating environment.

3. Although there is a great deal of green belt that could be declassified, I am not saying it should all be built on. It is vital to get the density of housing right. It is essential to have adequate availability of park space for sport and social activities. Most people are not looking for one hour walking trails but rather ten to twenty minute walks space where they can get away from traffic noise. Merrow Downs might not be groomed for football but it serves as a very pleasant walking and picnic space.

4. Another aspect of the local Green Belt worth preserving (and developing) are the various water meadows. These are marvellous for the variety of wildlife they support. No doubt these water meadows play a part in flood management.

5. Planners just have to come up with a figure for the ratio of housing to recreation space and stick to it. Green belt restrictions are forcing developers to pack houses into small pockets of Brownfield sites with the result houses are becoming too small for effective family living and with inadequate parking spaces. Green Belt restrictions are acting as a choke on the quality of the housing stock. Retirees need bungalow type houses that are all on the flat. This is not so efficient in terms of land use, but such houses are in short supply.

6. It is depressing to hear the whining of the Nimbies. All they want is their green surroundings retained for their status quo. If their views were acted on all house building would come to a halt. This clearly would be a farcical situation. After all, probably half the population of the wider Guildford area are living in houses that were built on pristine green fields within the last 60 years.

7. Obviously, issues of adequate infrastructure, environmental sustainability and flood management have to be recognised and catered for. But we are talking about housing developments taking place over the next twenty years. GBC has to come up with impact statistics and published proposals for dealing with these challenges in advance of the new township developments.

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

Attached documents:
I object to the proposal for the development of Garlick’s Arch (Policy A43). 400 homes and an industrial unit are not wanted. Industrial, commercial and personal vehicles will increase traffic beyond an acceptable level for the area. Access roads at Burnt Common are not wanted.

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

Attached documents:

Comment ID: PSLPS16/4896  Respondent: 15497857 / Elisabeth A Hawkey  Agent:

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

I also object strongly to Policy A46 Land south of Normandy and north of Flexford being build upon. It is an inappropriate size of development housing and school in an area of rural roads, two small railway bridges and it is totally unsuitable to increase the traffic on these unclassified roads. I lived there for the first 20 years of my life. I know the beauty the area has, this should not be sacrificed to increase housing. The congestion to surrounding villages is totally ridiculous. The infrastructure in this borough is not there to cope with 1000+ homes. Is there a need for this school?

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

Attached documents:

Comment ID: PSLPP16/10185  Respondent: 15497857 / Elisabeth A Hawkey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I object to the number of homes you propose to build will inevitably put strain on the current infra-structure including highways, schools and GP surgeries. I understand that there are not enough secondary school places for the current number of young people and GP Practices do not have the resources to expand.

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

I object to the use of Green Belt land the protection of which, was and still is, a Government priority. Guildford Borough Council are stealing it from under our noses.

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

I object to the limited consultation period.

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: PSLPS16/4901  Respondent: 15497889 / Hugo Wadey  Agent:

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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: PSLPS16/4902  Respondent: 15497889 / Hugo Wadey  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 A45 The Talbot Ripley as this is over development in an open space within the Green Belt

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Attached documents:

Comment ID: PSLPS16/4903  Respondent: 15497889 / Hugo Wadey  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

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Comment ID: PSLPP16/10196  Respondent: 15497889 / Hugo Wadey  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?

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Comment ID: PSLPP16/10197  Respondent: 15497889 / Hugo Wadey  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:

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 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?

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<th>Comment ID: PSLPS16/4911</th>
<th>Respondent: 15497953 / Rebecca Dougherty</th>
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<tr>
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Attached documents:

Comment ID: PSLPS16/4912  Respondent: 15497953 / Rebecca Dougherty  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: PSLPP16/10201  Respondent: 15497953 / Rebecca Dougherty  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: PSLPP16/10203  Respondent: 15497953 / Rebecca Dougherty  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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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.

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

Attached documents:

Comment ID: PSLPS16/4915  Respondent: 15498049 / Natasha Howard  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: PSLPS16/4916  Respondent: 15498049 / Natasha Howard  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Attached documents:

Comment ID: PSLPS16/4918  Respondent: 15498049 / Natasha Howard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Comment ID: PSLPS16/4919  Respondent: 15498049 / Natasha Howard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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Attached documents:

Comment ID: PSLPS16/4920  Respondent: 15498049 / Natasha Howard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
happen elsewhere, where no natural beauty will be needlessly destroyed.

I do understand that there is a need for housing, but cannot fathom why it needs to be here. Particularly considering my next point:

2. **Infrastructure**: The Horsleys cannot realistically cope with the proposed increased population: the narrow roads, limited parking, sewage systems, drainage, the already full train station parking lot, to name just a few. Where would an additional (minimum of) 533 cars go?

3. **Schooling**: A significant personal objections is that I live within 2 miles of the local school and my child cannot get in, due to it's increasing over subscription. By no stretch of the imagination will Horsley be able to school any more children. This is a great great pity as it stands already. Why would we want to make this any worse??

4. **This is a peaceful village**: with a wonderful sense of community, a treasure so uncommon in today's world. People move and stay here to enjoy and appreciate the quieter village lifestyle. The development of chain stores and other facilities would ruin it for the existing and proposed homes.

I hope that you will kindly consider these points.

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

**Attached documents:**

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I am writing with respect to the GBC draft Local plan which I strongly oppose.

I strongly disagree with building on Green belt land.

**In no way would the current infrastructure support the number of houses proposed in East and West Horsley.** Horsley station is already congested. The medical centre is barely sufficient for the number of people already living here. The Raleigh school is bursting at it's seems. The roads could not cope with such a traffic increase.

I appreciate the need for housing however, I think it is important that we protect the green belt for generations to come. I love London but I chose to move out to the Horsleys to give my children green open spaces and the chance to be brought up within a small rural community.

I sincerely hope that you take account of this letter, and of the many other people who I know are unhappy with your local plan.

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

**Attached documents:**
Comment ID: PSLPA16/2460  Respondent: 15498241 / Faye Church  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: PSLPS16/4931  Respondent: 15498241 / Faye Church  Agent:

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

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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: PSLPS16/4932  Respondent: 15498241 / Faye Church  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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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**Comment ID:** PSLPS16/4933  **Respondent:** 15498241 / Faye Church  **Agent:**

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

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**Comment ID:** PSLPS16/4935  **Respondent:** 15498241 / Faye Church  **Agent:**

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

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**Comment ID:** PSLPS16/4936  **Respondent:** 15498241 / Faye Church  **Agent:**
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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Comment ID: PSLPS16/4937  Respondent: 15498241 / Faye Church  Agent:

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

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Comment ID: PSLPP16/10230  Respondent: 15498241 / Faye Church  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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4337</th>
<th>Respondent: 15498273 / Naomi Salmon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

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.

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: PSLPA16/2463  Respondent: 15498369 / Kris Steadman  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: PSLPS16/4940  Respondent: 15498369 / Kris Steadman  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: PSLPS16/4942  Respondent: 15498369 / Kris Steadman  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: PSLPS16/4943  Respondent: 15498369 / Kris Steadman  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 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: PSLPS16/4944  Respondent: 15498369 / Kris Steadman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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: PSLPS16/4945  Respondent: 15498369 / Kris Steadman  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: PSLPS16/4946  Respondent: 15498369 / Kris Steadman  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: PSLPP16/10234  Respondent: 15498369 / Kris Steadman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies 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: PSLPP16/10235  Respondent: 15498369 / Kris Steadman  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: PSLPP16/10232  Respondent: 15498369 / Kris Steadman  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: PSLPP16/10233  Respondent: 15498369 / Kris Steadman  Agent:

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

Do you consider this section of the document; complies with 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: PSLPS16/4941  Respondent: 15498401 / Anna Garfield  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 am a frequent visitor to the borough, working in Guildford and visiting relatives in Ockham where I grew up. I am writing to object to the draft Local Plan for the following key reasons:

1) There is plenty of brownfield land in the borough which should be regenerated before Green Belt land is even considered. I therefore object to the plan for such a huge amount of new housing to be built on Green Belt land.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. Development on the site will create an urban corridor stretching from London to Guildford. I don't believe there are any exceptional circumstances which warrant removing the land from the Green Belt under the NPPF.

3) I object to the excessively high number of houses to be built per year -693. This is more than double the figure used in previous plans and there is no clear reason for the dramatic increase.

4) I object to the threat to the village of Ockham and the blight on properties there. The plan calls for a small 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.

5) I object to the negative impact on transport, local roads and road safety. I specifically object to:
1. The suggestion that the development will result in a meaningful shift to cycling and walking. The development is too isolated for people to give up their 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.
6. The lack of suitable public transport. The Guildford Waterloo rail route is already hugely overcrowded and cannot cope with the proposed increase. Car parking at the stations is already at capacity.

6) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) when the planning application has already been 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 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 request that these objections are 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: PSLPP16/10244   Respondent: 15498529 / Donna Smith   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): ()

Policies E7 Guildford Town Centre and E9 Local Centres.

1. Introduction
1.1 We have considered the above policies with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework. Policy E7 and E9 are therefore considered not sound.

1.2 We consider that limiting the number and location of hot food takeaways in such a way would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people’s dietary choices. Minimal justification has been issued for 500m exclusion zone, and there is no evidence to justify such an approach.

2. Policies E7 and E9 are not positive, justified, effective or consistent with the Framework.

2.1 Restricting the location and concentration of new A5 proposals within the Borough is not a positive approach to planning. The Frameworks “foreword” promotes sustainable development this is about positive growth, making economic,
environmental and social progress for this and future generations.

2.2 As worded, the policy E7 takes an ambiguous view of A5 uses in relation to schools. It applies an over-generic approach to resist development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.

2.3 The policy is inconsistent with Para 19 and 21 of the Framework. Para 19 states:

Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

2.4 Para 21 states:

Investment in business should not be over-burdened by the combined requirements of planning policy expectations.

2.5 The Inspectorate recently concluded that the Greenwich Local Plan would be unsound if it contained the attempt in paragraph 4.3.55 to restrict new hot food takeaways within 400 m of a school. The Inspectors Report published May 2014 confirms “If such a restriction is to be imposed as a matter of policy then it must be included in Policy TC(c). However, I do not consider that such a restriction serves any land use planning purpose. In any event, I can foresee difficulties in attempting to implement such a restriction. For example, what criteria would be used to determine “unhealthy” food, and how frequently would this be assessed for an individual business? In addition, the practicalities of enforcement at a time when public expenditure is being reduced may render such a policy incapable of enforcement. Whilst it may be a laudable aim, the Local Plan would be unsound if it contained this provision.”

2.6 There is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. We confirm this at Appendix A to this objection. This appears to be recognised by the use of the word ‘potential’ in the policy. There is no evidence and the statement in the draft policy should be removed.

2.7 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools.’ It instead highlighted the need to ‘develop a higher quality evidence base’.

2.8 This lack of evidence has been confirmed in a number of planning decisions. For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’.

2.9 The evidence provided at Appendix B confirms that 70% of purchases by students in the school fringe are purchased in non A5 shops.

2.10 Policy E7 does not restrict the location of new A1, A3 or A4 uses within the 500m zones and therefore the sale of food and drink will still occur. The proposed approach is therefore not effective and is unjustified. The policy will place a moratorium against one use class of development, but will not meet the ambition of the policy.

2.11 There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises. Evidence confirming this is set out in Appendix C.

2.12 Research by Peter Dolton states that “At least 50% of the days in a year kids don’t go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school.” This clarifies that a blanket restriction on location is unjustified.

2.13 Similarly, research by Brighton & Hove concluded that ‘the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day’.

Footnotes

1 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

2 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate


2.14 Only limited purchases of food are made at A5 uses on journeys to and from school. Further details are set out in Appendix D.
2.15 Given the limited access that children have to fast food during the school day, this generic restriction is disproportionate; is not justified; and would not be effective.

3. Soundness – summary
3.1 We consider that restricting the concentration and location of hot food takeaways as proposed would be unsound and fails to meet the four tests of the Framework. It is not a positive approach to planning; justified; effective; or consistent with national planning policy.
3.2 The Inspectorate with regard to the Greenwich Local Plan concluded that he does not consider that such a restriction serves any land use planning purpose. Furthermore the Inspector confirmed that he could foresee difficulties in attempting to implement such a restriction. Such a policy should therefore not be taken forward. No alternative wording or alterations can be suggested that would make the proposed policy sound.
3.3 Many restaurant operators have made major steps to expand the range of healthy options and work with the communities within which they are / will be part of. No account has been considered in relation to the food sold from different types of outlet.

4. McDonald’s has made major steps in recent years to expand the range of healthy offerings
4.1 As a responsible business, McDonald’s recognises it has a role to play to support its staff, customers, and the communities in which it operates to live healthier lifestyles. For this reason, McDonald’s has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice, and to reformulate our products. For example, McDonald’s has:
  - Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu
  - Completely removed hydrogenated trans-fats from its menu
  - Reduced salt in our Chicken McNuggets by 36%, and our fries by a quarter since 2003
  - Reduced fat in its milkshakes by 34% per serving since 2010
  - Reduced fat in its deli rolls by 42% since 2011
4.2 McDonald’s has also led the way displaying nutritional information to help its customers make informed choices. Since 2011, McDonald’s has provided calorie information on every one of its 1,200+ menu boards in restaurants across the UK.
4.3 This is in addition to the nutritional information that is already available on its website, on its tray liners, on its packaging, and via McDonald’s mobile phone app. In 2012 alone, McDonald’s received 2.2 million visits to its nutrition web page.
4.4 Furthermore, McDonald’s is committed to responsible advertising, and advertise to children only food items that are not classified by the Government’s nutrient scoring criteria as High in Fat, Salt or Sugar “non-HFSS”. All of McDonald’s advertising to children features at least one portion of fruit or vegetables, and a no added sugar beverage such as milk.
4.5 As a significant customer of British farming, McDonald’s buys quality ingredients from 17,500 UK and Irish farmers. It now spends more than £390 million every year on British and Irish produce, compared to £269 million in 2009. 4.6 All of McDonald’s burgers are made with 100% British and Irish beef. We use whole cuts of forequarter and flank, with nothing added or taken away in the process.
4.7 In addition, McDonald’s only uses 100% British RSPCA Freedom Food Pork across its entire menu. As a result, all pork suppliers are required to meet strict animal welfare standards.
4.8 McDonald’s was also one of the first retailers to switch to using free range eggs – which it did back in 1998. Free range eggs are now used in its entire menu – including its sauces, muffins and the coating on chicken nuggets. Every year McDonald’s use over 100 million free range eggs, sourced from more than 200 UK producers, and for its work in this area they have been awarded ‘Food Business of the Year’ by the British Free Range Egg Producers Association.
4.9 The strength of McDonald’s supply chain – which was clear of any horsemeat – has also been confirmed by Professor Chris Elliott, who said in light of the horsemeat scandal: “McDonald’s invited us to look at farms and abattoirs – it was a very simple supply chain. The other thing I was very impressed about was the length of contract McDonald’s had with its suppliers.”
5. McDonald’s also contributes to the community
5.1 As the Community Partner of the Football Association, McDonald’s has helped to train and recruit more than 25,000 coaches. These coaches in turn have provided more than 2 million hours of free quality coaching, to one million young...
players.

5.2 Over 1,000 McDonald’s restaurants across the UK are ‘twinned’ with a local team to provide free kit, equipment, advice and expertise.

5.3 Each of McDonald’s restaurants also conduct a minimum of three litter patrols on a daily basis, and conduct larger Love Where You Live ‘clean up’ events. McDonald’s is also the primary sponsor of the Mayor of London’s Capital Clean Up campaign, to tackle litter across London.

5.4 Last year, McDonald’s restaurants in Greater London organised over 50 community clean-up events, with over 1,400 volunteers taking part.

6. McDonald’s is a major employer of young people

6.1 McDonald’s is a major employer of young people under the age of 25, and for many it provides a first step on the career ladder. McDonald’s offers all staff the opportunity to gain qualifications which include Adult Certificates in English and Maths, a Level 2 Apprenticeship, and a Foundation Degree in Managing Business Operations.

6.2 McDonald’s invest £43 million annually in staff training and development.

7. There is a lack of evidence to demonstrate whether fast food is located by schools, or whether schools are located by town centres

7.1 When McDonald’s looks at the economic viability of a new site, it does not factor in predicted sales from school children or proximity to schools.

Footnotes

6 Evidence at Environment, Food & Rural Affairs Select Committee Inquiry, January 2014

7.2 Research by Christoph Buck has identified a similar approach with other retailers. His research suggests that ‘food retailers are mainly located near major roads and in inner cities.’

7.3 Indeed, ‘food retailers are not clustered around schools for up to 1.5 km’8 Correlations between schools and fast food density are therefore due to the proximity of both to town centres, where there is a broad mix of retail on offer.

7.4 With a policy restricting location in place, all A5 development would likely be directed away from major, district and local centres – contrary to the sequential test.

Appendix A – There is a lack of evidence to demonstrate the link between fast food, school proximity, and obesity.

1. This has been confirmed by Public Health England and the Local Government Association (November 2013). Their paper, Healthy People, Healthy Places states there is ‘an unavoidable lack of evidence that can demonstrate a causal link’ between fast food, school proximity and obesity.

2. The same paper states there are only ‘theoretical arguments for the value of restricting the growth in fast food outlets’.

3. Oxford University’s Department of Population Health conducted ‘A systematic review of the influence of the retail food environment around schools on obesity-related outcomes’ (December 2013).10 This was funded by NHS Berkshire and the British Heart Foundation, and is a comprehensive analysis of the existing evidence base.

4. The research ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools’. It instead highlighted the need to develop a ‘higher quality evidence base’ which for instance:
   - Uses a consistent way to classify a food outlet, in order to compare results from different studies
   - Looks at the age range of children, and their interaction with the environment. Age can influence travel time, distance travelled, the availability of pocket change, and other factors
   - Understands the need to assess a child’s mode of travel to and from school in decisions about appropriate buffer distances
   - Recognises that food environments vary between countries – most associations between food environment and obesity came from North America

5. The review did find some limited evidence for an effect of the school environment on body weight, but it added ‘these results should be interpreted cautiously’. Of 72 associations, only 19 showed a statistically significant positive relationship
between body weight and exposure to food outlets. The review also identified associations with convenience stores as well as fast food outlets.

Footnotes

8 Christoph Buck et al. Clustering of unhealthy food around German schools and its influence on dietary behaviour in school children: a pilot study, page 6, 2013
9 Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013
10 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

6. A number of studies have reached similar conclusions. These include, but are not limited to:
- David Harris – ‘no correlation between students’ being overweight risk and the presence of stores with unhealthful food choices near their schools.’ 11
- Philip Howard – Research ‘failed to find a consistent association between school overweight rates and nearby fast food restaurants’. 12 If anything, this research found ‘Convenience stores demonstrated stronger correlations with school overweight rates’.
- An and Sturm – ‘no evidence to support the hypotheses that… less exposure to fast-food restaurants or convenience stores within walking distance improve diet quality or reduce BMI among Californian youth.’13
- Fleischhacker – This systematic review of fast food access studies concluded 53% did not find any significant associations between the fast food environment and obesity. ‘In children, only one of five studies found an association between BMI and the fast food environment.’14

7. This lack of evidence has also been confirmed in a number of planning decisions.
- For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’.15
- Further, in Newham the Planning Inspectorate called for ‘deletion of an exclusion zone for A5 use class within 400m of secondary schools’ as ‘the policy is not supported by the evidence at present’.16

Footnotes

11 David Harris et al. Location of Food Stores Near Schools Does Not Predict the Weight Status of Maine High School Students, page 276, 2011 - http://ac.els-cdn.com/S1499404610004574/1-s2.0-S1499404610004574-main.pdf?_tid=720c269ec3d7-11e3-874e-00000aab0f01&acdnat=1397481765_c271ecb04c8e2d5970db420d656f128
12 Philip Howard et al. Proximity of food retailers to schools and rates of ninth grade students: an ecological study in California, page 6, 2011
14 S Fleischhacker et al. A systematic review of fast food access studies, page 8, 17th December 2009
15 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate
Appendix B – Food in the school fringe tends to be purchased in non-A5 properties.
1. Research by Professor Jack Winkler (London Metropolitan University) into the ‘school fringe’ – found just 3/10 purchases by students in a 400m school fringe were made in A5 properties.17
2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded ‘the most popular shop near Urban was the supermarket, with more visits than all takeaways put together’.  
3. Professor Winkler’s findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do ‘not address sweets and other high-calorie food that children can buy in shops near schools.’18
4. Research by Brighton and Hove found that ‘Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises’.19
5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that ‘Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime’.20
6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children.21 22 23

Footnotes
18 Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013
19 Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 28, September 2011

Appendix C – There is a lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A class premises.
1. A key finding of Brighton & Hove’s research was that ‘newsagents and supermarkets [are] equally as influential on the unhealthy choices of pupils.’24
2. Hot food take-aways are identified as a particular concern, but there is a lack of evidence to inform why A5 units have been identified as a concern over other units, namely A1 and A3 units.
3. Research by the Children’s Food Trust for instance found that ‘Once outside school… students faced an environment designed to encourage less healthy food purchasing, mostly from corner shops and supermarkets near to school, outlets which successfully promoted less healthy foods to this population.’25
4. The report added ‘this study observed no visits to takeaway outlets’ – although it did qualify this saying a ‘larger, more representative study’ was required to determine whether proposals to restrict A5 outlets are effective in promoting healthier eating habits in teenagers.
5. Similarly, research elsewhere found ‘traditional fast food outlets offered a greater variety of healthier breakfast entrees, healthier lunch/dinner entrees, and healthier lunch/dinner side dishes’ than convenience stores, grocery stores, and supermarkets.26
6. We therefore assert that sole inclusion of A5 premises is irrational, will not be effective, and is therefore not justified.
July 16
Appendix D – Only a limited number of journeys to and from school involve a purchase at a food outlet.
7. This has been confirmed in research by the Children’s Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet.27
8. Of the food purchases made on school journeys, confectionary was the most popular item sold – which McDonald’s does not offer on its menu.
9. Likewise, research by Ashelsha Datar concluded that children ‘may not purchase significant amounts of junk food in school’ – partly due to ‘fewer discretionary resources to purchase them’.28
10. Indeed, even where purchases were made, ‘children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.’
11. Similarly, research by Fleischhacker highlighted the need for future school-based studies to ‘gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools.’29
12. This was also highlighted in the systematic review by Oxford University, which states ‘future work should also incorporate a child’s usual mode of travel to and from school into decisions about appropriate buffer distances.’ The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change.30

Footnotes

27 Children’s Food Trust – November 2011, page 1 http://www.childrensfoodtrust.org.uk/assets/research-reports/ journey_to_school_final_findings.pdf
28 Ashelsha Datar & Nancy Nicosia, Junk Food in Schools and Childhood Obesity, page 12, May 2013
29 S Fleischhacker et al. A systematic review of fast food access studies, page 9, 17th December 2009
30 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13-14, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.
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: PSLPS16/4963  Respondent: 15498785 / Catherine Elingworth  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: PSLPS16/4965  Respondent: 15498785 / Catherine Elingworth  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: PSLPS16/4967  Respondent: 15498785 / Catherine Elingworth  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?

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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: PSLPS16/4972  Respondent: 15498785 / Catherine Elingworth  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: PSLPP16/10248  Respondent: 15498785 / Catherine Elingworth  Agent:

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

Do you consider this section of the document; complies 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: PSLPP16/10250  Respondent: 15498785 / Catherine Elingworth  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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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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</table>

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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<th>Comment ID: PSLPP16/10251</th>
<th><strong>Respondent:</strong> 15499073 / Amelia Pinder</th>
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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:
Do you consider this section of the 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. My reasons are the following:

First I would like to say I don't think you should stick to the local plan, building on the green belt because it will badly affect poor aminals e.g. nesting birds like by me.

It will also affect people in Horsley because you wouldn't be able to enjoy the space and for children they might play there so it will affect them.

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

Attached documents:

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Comment ID: PSLPP16/10260  Respondent: 15499297 / Alex Mundy  Agent:

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

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

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

Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will be suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

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

Attached documents:

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Comment ID: PSLPP16/10255  Respondent: 15499297 / Alex Mundy  Agent:

Document:  Proposed Submission Local Plan: strategy 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 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 I deem as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. I 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.

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. 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.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

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: PSLPP16/10258</th>
<th>Respondent: 15499297 / Alex Mundy</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</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 was 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.

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): ()

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

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

Attached documents:
I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to the 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.

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on 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, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

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

Attached documents:

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Comment ID: PSLPP16/10257  Respondent: 15499297 / Alex Mundy  Agent: [Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2]

Do you consider this section of 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 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 with the large increase in housing twinned with large increase in cars and travel.

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

Attached documents:

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Comment ID: PSLPP16/10259  Respondent: 15499297 / Alex Mundy  Agent: [Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2]

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that GBC have not 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.

I 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:

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Comment ID: PSLPA16/2476  Respondent: 15499873 / Pan Illingworth  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: PSLPS16/5000  Respondent: 15499873 / Pan Illingworth  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: PSLPS16/5001  Respondent: 15499873 / Pan Illingworth  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: PSLPS16/5002  Respondent: 15499873 / Pan Illingworth  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 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: PSLPS16/5003  Respondent: 15499873 / Pan Illingworth  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 community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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

Attached documents:
I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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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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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: PSLPP16/10267  Respondent: 15499873 / Pan Illingworth  Agent:

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

Do you consider this section of the document; complies with 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: PSLPA16/2479  Respondent: 15500065 / Rachael Illingworth  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: PSLPS16/5015  Respondent: 15500065 / Rachael Illingworth  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: PSLPS16/5016  Respondent: 15500065 / Rachael Illingworth  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: PSLPS16/5017  Respondent: 15500065 / Rachael Illingworth  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:

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Comment ID: PSLPS16/5018  Respondent: 15500065 / Rachael Illingworth  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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<tr>
<th>Comment ID: PSLPS16/5019</th>
<th>Respondent: 15500065 / Rachael Illingworth</th>
<th>Agent:</th>
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</thead>
</table>

**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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5020</th>
<th>Respondent: 15500065 / Rachael Illingworth</th>
<th>Agent:</th>
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</table>

**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:
<table>
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<tr>
<th>Comment ID: PSLPP16/10278</th>
<th>Respondent: 15500065 / Rachael Illingworth</th>
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<tbody>
<tr>
<td><strong>Document:</strong> 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?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ( )</td>
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<tr>
<td>I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley</td>
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<td>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 P4</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ( )</td>
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<tr>
<td>I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/10275</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ( )</td>
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<tr>
<td>I OBJECT to the 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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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
Comment ID: PSLPP16/10276  Respondent: 15500065 / Rachael Illingworth  Agent:

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

Do you consider this section of the document; complies with 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: PSLPS16/5022  Respondent: 15500097 / Juliana 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): ()

I am writing to object to Guildford Borough Council’s Proposed Submission Local Plan: strategy and sites 2016, with particular reference to Site A46.

The proposal to allocate this area of Green Belt land for residential development is inconsistent with policies set out in the Council’s draft local plan itself. In particular,

Policy P2: Green Belt

This policy states that “In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” Very special circumstances have not been demonstrated. The proposal for Site A46 is essentially to allow a new town to be developed within a village in the Green Belt. This contradicts the statement in Policy P2 (4.3.24) that “Development within villages in the Green Belt is limited to small scale infilling”.

Attached documents:
Policy D4: Development in urban areas and inset villages

The allocation of Site A46 for development is inconsistent with the statement in Policy D4 that “proposals for new development within inset village areas will have particular regard to (inter alia): the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape”. It completely fails to protect the important character (4.5.50) of the village of Normandy. Such a large-scale development would by definition fail to “protect local landscape and townscape character” as indicated in the LCA, which states that “development will be expected to: conserve, and where possible, enhance existing character … and respect the setting of, and relationship between, settlements and buildings in the landscape”.

Briefly, my reasons for objecting to the proposal are:

- The number of new homes indicated in the proposal is completely disproportionate to the size of the village and would fundamentally alter its
- Alternative sites exist where development would not impact on sensitive Green Belt land and on the character of a rural
- The argument that a school would be justified by the development is When no case exists for building a school, a school cannot be used as justification for the residential development.
- The local infrastructure is unable to support such a large-scale The roads in this rural area cannot sustain the inevitable increase, with consequent safety issues. Peak time traffic is already a serious issue. It is unrealistic to suggest that increased parking at Wanborough station or measures to encourage cycling and walking would go any significant way to addressing this. The fact is that there are often multiple cars per household and people choose to drive even for very short journeys.
- Significant flooding is already an issue in the

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

Attached documents:

Comment ID: pslp171/1440  Respondent: 15500097 / Juliana Baxter  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): ()

While welcoming the removal of site allocations A46 and A47, I object to the proposed Green Belt boundary amendments that would result in the Normandy and Flexford settlements being inset from the Green Belt. The statement in Policy P2 that these villages (among others) are now inset presupposes that the proposal indicated on the map at Appendix H has been approved, so it is unjustified. Evidence of "exceptional circumstances" for these changes has not been provided. Furthermore the proposed boundary changes are incompatible with the principle of "openness", would be detrimental to the preservation of the character of the villages and would risk unmanageable pressure on local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
3. There is an ERROR in the Land Availability Assessment dated February 2016, and I ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. MCRA would oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic.

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

Attached documents:

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I am writing in response to the draft local plan and in particular the proposal to change the Settlement Boundary so that it includes Fangate Manor, thereby removing Fangate Manor from the Green Belt.

1. I OBJECT to the proposal to inset East Horsley from the Green Belt. The proposal to inset East Horsley from the Green Belt will be detrimental to the rural character of the village and should be dropped. The specific changes proposed are not justified under the National Planning Policy Framework rules.

2. I strongly oppose and OBJECT to the proposal to remove Fangate Manor from the Green Belt and include it within the Settlement Boundary. There are no exceptional Planning circumstances to justify removing Fangate Manor from the Green Belt, and changing the Settlement Boundary does not in any way enhance the defensible nature of the Settlement Boundary. It merely involves moving the boundary from one hedgerow to another, but leads to the loss of Green Belt and agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
5. I OBJECT also to the re-inclusion in the plan of Policy A35 (Wisley airfield, Ockham). Under the plan, there would be significant change to neighbouring communities by creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

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

Attached documents:

4. I OBJECT to the proposed development sites in East and West Horsley (A36-41). Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops.

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 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: PSLPA16/2491  Respondent: 15500161 / Joanna Scott  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: PSLPS16/5084  Respondent: 15500161 / Joanna Scott  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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, 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) Why not?

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) Some of my friends have struggled to get school places as it is!

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.

I already live on a busy road. This will have a very negative impact on my family's (and other residents) health and wellbeing, including not being able to sleep at night due to increased traffic. This is going to affect our quality of life!

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 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: PSLPP16/10305  Respondent: 15500161 / Joanna Scott  Agent:

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

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

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

I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, Which includes over 80 ancient oak trees. I am a 16 year old who is really interested in country life and want to preserve the woodlands.

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

Attached documents:

Comment ID: PSLPP16/10298  Respondent: 15500161 / Joanna Scott  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): ()
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: PSLPP16/10300  Respondent: 15500161 / Joanna Scott  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): ( )

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: PSLPP16/10302  Respondent: 15500161 / Joanna Scott  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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

Attached documents:

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Comment ID: PSLPP16/10306  Respondent: 15500161 / Joanna 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): ()

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. As somebody with a child relying on their bike to get around I object to this being even more dangerous! As a car driver I object to the added safety implications.

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:

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Comment ID: PSLPP16/10307  Respondent: 15500161 / Joanna Scott  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, I (and other residents) 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.

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. I use this centre when I need to, and I know it is difficult to get an appointment already. 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. In recent years we have lost our local police presence and it is unrealistic to expect that will improve.

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

Attached documents:

Comment ID: PSLPP16/10312  Respondent: 15500161 / Joanna Scott  Agent:

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

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

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

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

Comment ID: PSLPP16/10313  Respondent: 15500161 / Joanna Scott  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)

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 our health. Hold on a minute, I live here and I object!

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

Attached documents:

Comment ID: PSLPP16/10293  Respondent: 15500161 / Joanna Scott  Agent:

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

Do you consider this section of the document; complies with 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:

Comment ID: PSLPP16/10297  Respondent: 15500161 / Joanna Scott  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): ()

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 because I live alongside it, 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: PSLPP16/10274  Respondent: 15500161 / Joanna Scott  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 (where my family live), Send and Glandon. The services in these villages will be unable to cope with the level of development proposed. I do not believe the proposed developments meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Gartick's Arch (A43) are in unsustainable locations. We 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 cars. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Gartick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Surely 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. I know this as we have to use them daily. At the slightest issue on the A3 traffic queues outside our house using it as a cut through. Stationary engines running. Noise and pollution increasing. Further vehicle movements will result in even more acute congestion and greater pollution. My family and other 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: PSLPP16/10291  Respondent: 15500161 / Joanna 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): ()

I object to the Borough Wide Strategy (Policy S2)

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

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, we 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. On MY community!

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

Attached documents:

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Comment ID: PSLPS16/5025  Respondent: 15500385 / Chris McDermott  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 voice my strong objections to the plans proposed for Normandy and Flexford in the revised local plan.

The supposed need for a new school

At the borough council meeting it was agreed that the decision to proceed with any development in Normandy/Flexford would be entirely predicated on the need for a new school.

- The requirements for new schools are determined by the county council, and in reviewing their plans I cannot see anywhere a proposal for a new school to be built in this part of the borough. There is simply no requirement for this from Surrey County Council.
- In addition, our Country Councillor, Keith Witham, has done an excellent job in engaging with other schools in the area, and without exception, found that they are all under-subscribed. There was no support at all - quite the opposite, in fact - from school heads that a new school was needed.
- Surrey County Council has already started development on a new school at Mayford, also in the catchment area.
- This area of the borough is well covered for schools, notably Ash Manor, itself under-subscribed. There is no need for a new school in 'the west of the borough'.
- To suggest that a new school be built at considerable cost when there is no demonstrable need is financial mismanagement of the highest order; this is public money, and I do not want my taxes spent in this way.

Given this, your proposal to highlight the need for a new school as an 'exceptional need', that would override green belt restrictions, is spurious and totally unfounded.

Building on the Green Belt

Normandy is a small rural community sitting in the protected Green Belt, adjacent to Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. The specific area of land you are proposing to build on is adjacent to Listed Buildings, and contains pastures, farming, hedgerows, trees and grasslands, all supporting a wide variety of wildlife. This is why I choose to live here. Your proposals would turn this pleasant rural community into a hideous housing estate, which I, and I suspect most residents of Normandy, simply do not want.

The purpose of the Green Belt is to protect the land around larger cities from urban sprawl, maintain areas for forestry, agriculture and wildlife, and to have open areas with clean air for outdoor activities. Your role as councillors is to preserve and protect that vision, not to ride rough shod all over it.

David Cameron recently wrote of the requirement to protect the green belt and ensure that planning decisions were made by...
local people. That is us, the residents of Normandy and Flexford, and not you in isolation.

Your rationale for attempting to justify this intrusion on to the Green Belt with 'exceptional circumstances' is spurious, flawed and, through linking it with an additional 1,100 residences, is self-fulfilling.

**The supposed need for additional housing**

I am frankly speechless that you feel a proposal to double the number of dwellings and triple the number of residents is in any way a sensible thing to do. And to then further propose that this all takes place on land designated in the Green Belt beggars belief. To link this with the supposed need for a new school at the same location represents a bizarre circular logic, each requirement justifying the other. Neither are needed.

Your plans speak of the 'potential' need for additional housing. If the need is only potential, the circumstances cannot be exceptional. Which, of course, they are not.

Nonetheless, you seek to bring the number of residents to 4,000. This because it is apparently a threshold for a sustainable village community. But we already have an active community in Normandy - we don't need to triple the population to do this. We already have a nursery school. We already have a primary school. We already have a surgery. We already have a pharmacy. We don't need 4,000 people!

You choose to combine the communities of Normandy and Flexford to reconcile your numbers of 4,000 residents, but these are separate communities. Seeking to bring them together and then add a further 2,500 resident is not 'coalescence', it is urban sprawl in action - you are supposed to prevent this, not cause it. You are justifying this with numbers and spreadsheets, and ignoring the needs of the existing residents.

An additional 1,100 residences simply represents a scale of development that is wholly inappropriate in relation to the existing communities. The government itself has stated recently that there are no plans for such inappropriate development - why are you choosing to override this guidance?

The existing infrastructure in the village barely sustains the current population, how do you propose to cope with treble the number of residents:

- You cannot build new roads between Glaziers Lane and Westwood Lane. They will become overly congested and vastly increase pollution - the exact opposite of what we currently have with the protected Green Belt. These roads have restrictions in terms of railway bridges and single file access (railway bridge in Westwood Lane)
- The Hogs Back and Guildford Road are already congested nightmares during the rush hour, your proposals will make this even worse
- again, the cost of upgrading this and all other infrastructure (drainage, electricity, new roads, telephone and internet upgrades) simply smacks of poor use of public funds

My suggestion would be that you look to develop brownfield sites, and not contemplate the unwarranted intrusion onto the Green Belt.

I believe the proposed changes are ill-considered, and I urge you to review and reject outright the changes to the local plan as they affect Normandy and Flexford.

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

**Attached documents:**

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**Comment ID:** PSLPA16/2481  **Respondent:** 15500449 / John Banks  **Agent:**

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

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

3. There is an **ERROR** in the Land Availability Assessment dated February 2016, and I ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. MCRA would oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic.

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

Attached documents:

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**Comment ID:** PSLPA16/2480  **Respondent:** 15500449 / John Banks  **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 am writing in response to the draft local plan and in particular the proposal to change the Settlement Boundary so that it includes Fangate Manor, thereby removing Fangate Manor from the Green Belt.

1. I **OBJECT** to the proposal to inset East Horsley from the Green Belt. The proposal to inset East Horsley from the Green Belt will be detrimental to the rural character of the village and should be dropped. The specific changes proposed are not justified under the National Planning Policy Framework rules.
2. I strongly oppose and **OBJECT** to the proposal to remove Fangate Manor from the Green Belt and include it within the Settlement Boundary. There are no exceptional Planning circumstances to justify removing Fangate Manor from the Green Belt, and changing the Settlement Boundary does not in any way enhance the defensible nature of the Settlement Boundary. It merely involves moving the boundary from one hedgerow to another, but leads to the loss of Green Belt and agricultural land.

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

Attached documents:

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**Comment ID:** PSLPS16/5034  **Respondent:** 15500449 / John Banks  **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): ()
5. I **OBJECT** also to the re-inclusion in the plan of Policy A35 (Wisley airfield, Ockham). Under the plan, there would be significant change to neighbouring communities by creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

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

**Attached documents:**

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<tr>
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<th>PSLPP16/10280</th>
<th>Respondent:</th>
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4. I **OBJECT** to the proposed development sites in East and West Horsley (A36-41). Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops.

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

**Attached documents:**

<table>
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GBC Draft Borough Plan re Normandy - Site Allocation 46 and Site 47

I hereby I **like** to **object** against the Draft Plan for Normandy.

As you get probably plenty of emails I would like to keep it short.

Reasons for Objection:

Traffic Chaos.

I live on Westwood lane (cunningham close) with a young family. Traffic is already a major problem.
From the numbers of cars, types of vehicles and their speed.
A development of this size would cause westwood lane to be a dangerous and unhealthy place to live.
Something we did not choose for when we bought this house.
School
A secondary school is not needed in this area as two nearby schools are under subscribed.
So please can we protect the greenbelt.
Also you are breaking an election promise as in July 2015 it was said: We always protect green belt and make sure planning decisions are made by local people.
I am very worried for the future of Normandy and my children. If the plans go ahead I will definitely be moving out of the area.

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

Attached documents:

Comment ID: PSLPA16/2482  Respondent: 15500513 / Alex Illingworth  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: PSLPS16/5028  Respondent: 15500513 / Alex Illingworth  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: PSLPS16/5029   Respondent: 15500513 / Alex Illingworth   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: PSLPS16/5030   Respondent: 15500513 / Alex Illingworth   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 7000 sqm 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: PSLPS16/5031   Respondent: 15500513 / Alex Illingworth   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: PSLPS16/5032  Respondent: 15500513 / Alex Illingworth  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: PSLPS16/5033  Respondent: 15500513 / Alex Illingworth  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:
<table>
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<th>Comment ID: PSLPP16/10283</th>
<th>Respondent: 15500513 / Alex Illingworth</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 all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to development in areas which are at risk of flooding (Policy P4) 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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Comment ID: PSLPP16/10282  Respondent: 15500513 / Alex Illingworth  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

Do you consider this section of the document; complies with 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: PSLPS16/5035  Respondent: 15500769 / A L Tozer Ltd (Laurence Dawson)  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 an owner and director of an international horticultural business in Cobham which owns land in Cobham and Ockham. Our Ockham site is very important for the development of the business and there are regular movements between the two sites of Tractors and cultivation and/or harvesting equipment. We also have vehicle movements between the two sites moving commercial stock.

I object very strongly to the re-inclusion of the Former Wisley Airfield/ Three Farms Meadows site into the Borough Local Plan after it was rejected as a suitable site for housing by the full planning committee and the planning department of the Borough.

I object to the plan’s proposal to remove the Wisley airfield / Three Farms Meadows from the green belt and we also strongly object to the similar proposals to build on green field sites in the Parish’s of East and West Horsley, Send and Ripley, and to the removal of these parish’s or parts of them from the Green Belt.

We object to the loss of the Agricultural land at The Farms Meadows through the proposed development there. Good agricultural land is a declining resource.
I object to the proposed development of the various sites in the parish’s of East and West Horsley, Ockham, Ripley and Send because they cannot happen without a big investment in services and this major requirement is hardly mentioned. Already the district is struggling with overflowing sewerage, with shortages of other utilities of Gas, water and electricity supplies. There is already a desperate shortage of school places for all age groups in this area of Surrey; Medical services are also fully stretched and inadequate for more clients. The Hospital will need to expand too.

I object to the proposals to increase the number of houses in this area by such a large amount on an annual basis. The road infrastructure is inadequate. The roads were developed in the days of the horse and cart, are narrow and cannot be widened easily because they are bounded by hedges. There are few footpaths and no cycle lanes or lighting. The mix of pedestrians, cyclists and ridden horses with fast cars and trucks are a recipe for disaster and litigation if no planning consideration was made. Due to the high traffic movements and the high number of goods vehicles using these lanes they are now breaking up. The area has some of the worst roads in the county.

I object strongly to the development because of its likely affect on the Wisley and Ockham commons, part of the Thames Basin Heaths Special Protection Areas, particularly considering atmospheric pollution, increased footfall and dog exercising on these fragile environments.

I object to the planning department, the planning committee and their subcontractors in devising a housing need without consideration and planning for the infrastructure needed to establish their proposals.

I strongly object to the proposals because of the effect on the picturesque villages which have a high number of old and historic houses, many listed. The proper development of The Borough should be to increase the number of high rise buildings in the centre, now that Guildford is a city, with schemes such as the station development, lesser rise building should be encouraged in the suburbs of Guildford.

We object to the lack of planning for work and employment for the residents of these developments. They cannot all take the train to London.

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

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

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

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: PSLPS16/5038  Respondent: 15500801 / Morgan Schooling  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: PSLPS16/5039  Respondent: 15500801 / Morgan Schooling  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.
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:
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:

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:
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<th>Respondent: 15500801 / Morgan Schooling</th>
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<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
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<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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<td>I live in Orchard Way in Send &amp; I wish to log a strong objection to the amount of Green Belt being removed from Send/ Ripley in the new local plan.</td>
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<td>I object to the way in which the Garlick’s Arch development was added to the local plan.</td>
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<td>I object to the huge lack of evidence that these high numbers of houses are actually needed in this area.</td>
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</table>
I object to the planned A3 junction changes at Burnt Common due to the negative effect on the surrounding villages which will not be able to handle the additional traffic in an already busy area. It will lead to more through traffic increasing the chances of road traffic accidents, particularly around the local schools.

I object to all the additional houses when the local schools are already overwhelmed with new applicants. The school in Send where my children attend is currently being rebuilt, with no further capacity to take additional children and has no desire to do so.

I object to all the additional houses as the local doctors surgery is already at its full capacity and this will put additional pressure on the services impacting local services.

I object to the additional amount of cars that will be on the road in the immediate and surrounding areas, causing further risk to our children as they travel to and from school.

I also object to the proposed housing development & traveler pitches off of Send Hill. This is completely unnecessary & Send Hill will struggle with the increased traffic. The road is not wide enough to accommodate caravan traffic & I would be hugely concerned about a increase in crime.

Please keep our Green Belt green, that is why we chose to move to Send & bring our children up here.

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:

Comment ID: PSLPP16/10294  Respondent: 15501057 / Spelthorne Borough Council (Geoff Dawes)  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): ()

Further to our detailed letter of 4 September 2014 the Borough Council welcomes Guildford’s approach to housing issues and notes that the plan seeks to provide for all of the objectively assessed housing needs for Guildford as established in the Final SHMA for Woking, Guildford and Waverley published in October 2015. It also notes that delivery of the required housing is dependent on key infrastructure, particularly major highway improvements, being provided during the plan period. Spelthorne Borough Council would have concerns if Guildford was unable, for whatever reason, but particularly because of the lack of highway improvements, to meet its commitments. Spelthorne BC would therefore welcome greater clarification on what options (Para 1.19) the Borough Council would consider in the event that the council finds that it is not meeting its objectively assessed need.

This Council also welcomes the fact that Guildford is seeking to meet all the assessed needs for gypsies and travellers for the plan period. It is noted that no provision is being made for transit sites at this stage but should a need be identified in the wider area this Council would expect to be consulted under the Duty to Cooperate.

The Council notes Guildford’s approach in seeking to achieve densities compatible with the local area context, character and sustainability. Paragraph 47 of the NPPF notes that local authorities should ‘set out their own approach to housing density to reflect local circumstances’. Whilst it is agreed that the local plan does this, Spelthorne would hope that, in order to maximise opportunities within the existing urban areas to meet the housing targets set out in policy S2 Guildford will seek to achieve higher densities in general. Policy H1 refers to supporting higher densities in Guildford town centre, but this could be extended to include employment areas, public transport hubs and other sustainable locations in the borough.

Spelthorne is currently undertaking work to consider the impact of extensions on the stock of dwellings which tends to increase the stock of larger dwellings whilst depleting the supply of smaller more affordable dwellings. Given the mix of housing types and tenures the Council is seeking to achieve it is not clear if Guildford has taken the effect of housing extensions into account as part of this process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The primary river in Guildford is the River Wey and its tributaries enter the River Thames at Shepperton. Spelthorne BC would be concerned if a reduction of floodplain storage in its upper catchment would result in greater flood water levels entering the Thames and affecting Spelthorne. This Council would therefore agree that Policy P4 on flood risk should ensure that flood storage capacity is maintained and ideally bettered, as any loss in capacity could lead to increased flows downstream. Spelthorne’s own policy on flooding (policy LO1 of the Core Strategy and Policies DPD 2009) reflects these principles of flood storage capacity.

I trust that you will find these comments helpful, but please let me know if you require further clarification on any of the points raised. We look forward to further discussions under the Duty to Cooperate in due course as necessary.

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

**Attached documents:**

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**Flood Risk**

The primary river in Guildford is the River Wey and its tributaries enter the River Thames at Shepperton. Spelthorne BC would be concerned if a reduction of floodplain storage in its upper catchment would result in greater flood water levels entering the Thames and affecting Spelthorne. This Council would therefore agree that Policy P4 on flood risk should ensure that flood storage capacity is maintained and ideally bettered, as any loss in capacity could lead to increased flows downstream. Spelthorne’s own policy on flooding (policy LO1 of the Core Strategy and Policies DPD 2009) reflects these principles of flood storage capacity.
I trust that you will find these comments helpful, but please let me know if you require further clarification on any of the points raised. We look forward to further discussions under the Duty to Cooperate in due course as necessary.

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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?

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The council relies on a strategic housing making assessment that is in question. The council have not scrutinised the figure provided and rely purely on the fact that other councils have used the consultant GL Hearn to assess the housing need. The SHMA appears to be exaggerated against ONS data. Two independent reviews have identified similar faults, which suggest that the figure is too high and inaccurate. They also identify that the recent referendum result relating to Europe may have an impact on economic growth and consequently should be reviewed. The SHMA must be reviewed to ensure that it is accurate before the housing figure is agreed.

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 use of the ‘Green belt and countryside study 2014’ within the evidence base. This is a subjective view of the green belt provided by one company, It is not evidence. It does not provide exceptional circumstances to remove land from the green belt.

I OBJECT to the use of the transport study within the evidence base. The SINTRAM model is designed for major routes and is not suitable for local roads as it takes no account of junctions. The three hour period also skews the data disproportionately downwards. This means that it will not necessarily provide a true reflection of traffic movement within Guildford. A different model should be used and the peak times adjusted to accurately reflect traffic, particularly within rural areas.

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

Attached documents:

Comment ID: PSLPA16/4162  Respondent: 15501217 / Luke Sarti  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 disproportionate amount of development in this small area of the borough; The area surrounding East and West Horsley will attract in excess of 5000 new homes, which accounts for over thirty-six percent of development. The area is predominantly rural in structure, nature and environment and does not have the infrastructure to cope.

I OBJECT to the disproportionate increase in housing in West Horsley. The local plan proposes an increase of thirty-five percent for a rural village, this is totally out of character. The density suggested by the council is not in keeping with the current environment, almost double the levels within the majority of the village.

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

Attached documents:

Comment ID: PSLPS16/5047  Respondent: 15501217 / Luke Sarti  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?

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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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I OBJECT to the inclusion of A35 Wisley Airfield in the local plan. The principle of the local plan is a presumption in favour of sustainable development. The Housing and Planning Act 2016 grants permission in principle to any development included within the local plan leaving only technical details to be considered by planning authorities. The site at Wisley failed in its planning application on a large number of points including infrastructure and sustainability. It is highly unlikely that these will be met in the future due to its positioning. Part of the site is green belt and no exceptional circumstances have been demonstrated. Aspects of the site also include high quality agricultural land.

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 Policy A41 relating to land south of East Lane. This is in contravention of para 85 NPPF which states that borders must clear and readily recognised. The natural border is the wood to its east. The inclusion of this site is not in keeping with the current settlement and character of the village; houses front East Lane up the woods to the east of this site which borders the road for approximately 400 yards. The land is green belt, no exceptional circumstances are made.

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 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?

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Do you consider this section of the document; complies with 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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<th>Comment ID: PSLPS16/5054</th>
<th>Respondent: 15501217 / Luke Sarti</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? ( )

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?

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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): ()

The Council have failed to consult effectively with infrastructure providers prior to publishing the draft local plan and as a consequence the Raleigh school has only recently put forward a proposal to build a new school on site A41. I am unable to comment on this because I do not have sufficient information.

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

Attached documents:

Comment ID: PSLPP16/17102  Respondent: 15501217 / Luke Sarti  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 no provision for a larger primary school within East or West Horsley despite the fact that Para 38 NPPF states that for large developments a primary school should be built within walking distance. Over 500 houses within East and West Horsley is large development when considering the size of the villages. The Surrey infrastructure review does not state that a new school is necessary despite the fact that the school is already oversubscribed causing children to be driven to other villages. (They do state the school may in the future identify a suitable site through infill opportunities). Surrey have suggested that children from the Horsleys can be accommodated either in Ripley or Clandon; both of which would necessitate parents driving, and in the case of Ripley travelling through a traffic blackspot.

I OBJECT to the local plan making East and West Horsley less sustainable. This is breach of para 7 and 9 NPPF and policy S1 of the proposed local plan. Failing to provide essential health, education and community facilities forces residents to use private vehicles to reach these when at present the majority can walk. The Infrastructure survey suggests that primary and junior school aged children will have to travel to Ripley and Clandon to attend school. No provision is made for any other facilities including health, dental, community and sport.

I OBJECT to the fact that the Local plan does not effectively demonstrate proposals to improve road networks to accommodate the additional vehicles likely to travel through East and West Horsley. The majority of through roads are narrow, have pinch points and are subject to closure through flooding on a regular basis.

LRN7 intends to introduce interventions to address potential highway performance issues resulting from the development of Wisley airfield. If these are those put forward by the developers they are likely to have a significant negative impact on East and West Horsley, or any traffic travelling to or through even without additional housing.

LRN22 East and West Horsley traffic management and environmental improvement scheme is non specific and the suggested £1m is insufficient to make sufficient improvements to deal with the substantial traffic increase likely if all aspects of the local plan are allowed.

I OBJECT to the council failing to deliver sufficient infrastructure to cope with the proposed development within this area of the borough. The bus network is almost non-existent and new buses are linked only to the Wisley development. The train
station car-parks at Horsley and Effingham junction are always full and there is no space to enlarge them. The roads are not suitable for commuters to cycle any distance due to the narrowness of the roads, speed of traffic and lack of space to build cycle paths.

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

Attached documents:

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Comment ID: PSLPP16/17098  Respondent: 15501217 / Luke Sarti  Agent:

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

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

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

The council appropriately identifies that the enhancement of the A3 is essential to the scale of development possible within the local plan. Page 21 Strategy and sites states 'The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford'. Highways England have made no commitment to improve the A3 and yet the local plan still seeks to deliver the full housing target through the delivery of three of its four strategic sites sighted directly beside the A3. The transport survey also highlights that traffic will be impacted and congestion worsened irrespective of what improvement measures are put in place.

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

Attached documents:

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Comment ID: PSLPP16/10303  Respondent: 15501217 / Luke Sarti  Agent:

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

Do you consider this section of the document; complies 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: PSLPP16/17097  Respondent: 15501217 / Luke Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of 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 highlight that the borough is 89% greenbelt and yet proposes to build approximately 65% of new development on greenbelt.

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

Attached documents:

Comment ID: PSLPP16/17100  Respondent: 15501217 / Luke Sarti  Agent:

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

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

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

I OBJECT to altering the green belt boundaries. Para 83 NPPF states green belt boundaries can only be altered in exceptional circumstances and where there is local support. Meeting the housing need is not exceptional circumstances. This has recently been reiterated by Central Government. No exceptional circumstances have been demonstrated.

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

Attached documents:

Comment ID: PSLPP16/17103  Respondent: 15501217 / Luke Sarti  Agent:

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

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

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

I OBJECT to the area described as West Horsley (south) being removed from the green belt. This clearly meets the description of a village that should be ‘washed over’ by the green belt in terms of size, appearance and character.

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: PSLPP16/17096  Respondent: 15501217 / Luke Sarti  Agent:

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

Do you consider this section of 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 have chosen not to impose any constraints in respect of the OAN.

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

Attached documents:

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Comment ID: PSLPP16/17101  Respondent: 15501217 / Luke Sarti  Agent:

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

Do you consider this section of 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 line with Central Government guidance I OBJECT to development on areas of high agricultural value. This includes Wisley airfield. If it is necessary to build on agricultural land it should be of low quality.

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

Attached documents:

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Comment ID: SQLP16/1896  Respondent: 15501217 / Luke Sarti  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 the 2016 local plan in its current format. I do not believe that it is sound and is not yet fit for implementation.

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

Attached documents:

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Comment ID: PSLPS16/5049  Respondent: 15501249 / Peter Hollington  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:
Do you consider this section of the document; complies 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: PSLPS16/5066  Respondent: 15501313 / Matthew Dougherty  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: PSLPS16/5067  Respondent: 15501313 / Matthew Dougherty  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: PSLPS16/5069  Respondent: 15501313 / Matthew Dougherty  Agent:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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

I OBJECT to the inclusion of 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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**Comment ID: PSLPS16/5070  Respondent: 15501313 / Matthew Dougherty  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: PSLPS16/5071  Respondent: 15501313 / Matthew Dougherty  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: PSLPS16/5072  Respondent: 15501313 / Matthew Dougherty  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: PSLPP16/10310  Respondent: 15501313 / Matthew Dougherty  Agent:

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

Do you consider this section of 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: PSLPP16/10311  Respondent: 15501313 / Matthew Dougherty  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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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: PSLPA16/2489 | Respondent: 15501377 / Elmbridge Borough Council (Karen Randolph) | Agent: |
Green Belt & Countryside Study

As part of the Draft Local Plan consultation the Council expressed concern regarding the transparency of the study and the subsequent methodology and assumptions for the appraisal of sites. Following the inspection of the Draft Local Plan; Topic Paper: Green Belt and the Countryside; and the Volume II Addendum, the Council welcomes the reconsideration of Green Belt as a constraint and the weight applied to the strength of each individual Green Belt parcel and how this has influenced the assessment of Potential Development Areas. The Council considers therefore that its concern regarding the process of applying the weight of the Green Belt parcels to have been addressed.

Nevertheless, the Council remains concerned that the original study and subsequent updates made since the Draft Local Plan consultation, make no attempt to address the strategic significance of the Green Belt across the wider area and its fundamental aim in preventing the sprawl of London. We feel it is essential that any study seeks to address this issue and that Guildford Borough Council works with surrounding Housing Market Areas (HMAs) in doing so. If we have missed this consideration amongst the evidence base documentation, we would be grateful if this is signposted.

In addition, we note a number of instances where development sites adjoin or are close to borough boundaries e.g. Land at Former Wisley Airfield. We are sure that it is appreciated that it will be important to work with the relevant boroughs districts as the Local Plan continues forwards on these issues, and in their stages of delivery / implementation. This will be particularly relevant where urban areas already coalesce.

Exceptional Circumstances Case

As recognised in the Topic Paper: Housing Delivery, exceptional circumstances are required to justify any amendment to the Green Belt boundary in accordance with the National Planning Policy Framework (NPPF), para. 83. We acknowledge the factors set out in para. 4.17 of the Topic Paper which Guildford Borough Council considers in general terms are exceptional. We do not wish to dispute that these are challenges for Guildford Borough Council. However, we have some concern that the issues identified are not particularly unique to Guildford Borough e.g. affordability and unmet need, are common place within a South-East and Surrey context. Further consideration may therefore be required to ascertain whether the Guildford Borough Council considers that this is an 'exceptional' case to amend the Green Belt boundary.

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

Attached documents:
Policy A35- Land at Former Wisley Airfield, Ockham

In regards to the proposed new settlement at Wisley (Policy A35), many of the concerns we previously raised have now been addressed through the publication of additional evidence base documents e.g. Habitats Regulation Assessment and Draft Infrastructure Delivery Plan, and by way of the evidence and statutory responses submitted in regards to the two planning applications for this site. The Council would however, like to reiterate those comments which it considers to be outstanding as well as make some additional comments in light of the publication of the Proposed Submission Plan and supporting evidence base.

Due to the location of Wisley Airfield in relation to Elmbridge Borough, this site is of keen interest to us and our residents and so, we continue to query whether this is the right location for this scale of growth when considered against the principles of Green Belt. The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. The site is located in the very north west of the Guildford Borough where the Green Belt is already very fragmented and particularly vulnerable to additional development, a point that was noted by the Inspector for the examination into our Core Strategy. It is therefore considered that further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location.

In addition, we would like to understand further the process for considering the eire. 100, parcels of Green Belt and countryside that were considered to have low or medium sensitivity and how the work has resulted in this site, as opposed to other areas, being proposed for allocation. Working our way through the various Volumes and Addendum it would appear that Guildford Borough Council has been selective in assessing the environmental capacity and sustainability of the parcels and we query why only those parcels on the edge of the urban edge were considered. Furthermore, Parcel G18 (Wisley) is not located next to the urban edge and therefore in accordance with this general approach, should have been excluded for further consideration as have other similar parcels.

Turning to the Proposed Submission Plan, we would recommend that Table 1- Planned Delivery between 2018 and 2033, be amended to show more clearly when it is envisaged that each strategic allocation would be delivered rather than generically stating the period of 1 - 15 years. Our concerns regarding the impact on the strategic road network remain, particularly in regard to the proposed development at Wisley but also other proposed development sites along and in close proximity to the A3. For example, Policy A43 Land at Garlick's Arch, Send Marsh / Burnt Common and Ripley which will further compound the impact on the road network should the appropriate mitigation measures not be implemented. Without the mitigation measures identified in the Government's Road Investment Strategy (RIS) (phases 1 and 2) the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe. As set out in the evidence base, the RIS schemes are complicated and may involve land acquisition and planning permission and, as a result, Highways England is cautious about programming these schemes. Given these complications, and also the infrastructure required on-site to support the scheme and the securing of the land north of the site for Suitable Alternative Natural Greenspace (SANG) (in regard to the Wisley scheme), it is considered that the Borough Council could provide a better estimate in terms of delivery knowing that the development of some sites is unlikely to be in the first few years of the plan.

I hope you find these comments useful in progressing work on the Local Plan.

Please do not hesitate to contact Mark Behrendt, Planning Policy Manager, if any of the points raised requires further explanation. Officers would be happy to meet with you to discuss our comments in more detail.

At this time the Council would like to reserve the opportunity to attend the examination in public.

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

Attached documents:
Gypsies, Travellers and Travelling Showpeople

Policy S2: Borough Wide Strategy sets out the proposal to provide 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Showpeople over the period 2012-2017. A further 30 pitches and 2 plots are then proposed between 2017 and 2027. In regard to the provision of new pitches and plots, the Council would like to reiterate the comments it made on the Draft Plan, namely:

- **it is confusing that the time periods stated above do not cover the same time period as the Submission Plan.**

Given that the plan period is from 2013 - 2033, the Council is concerned as to how the additional need for pitches and plots beyond 2027 will be accommodated, as identified through an updated Traveller Accommodation Assessment (TAA). The Council would be grateful if some indication could be provided as to a timetable for an updated TAA and whether this would allow the Council sufficient time to identify additional sites prior to the examination and adoption of the plan. The concern being that the existing TAA is out of date, not reflecting the Government’s changes to the Planning Policy for Traveller Sites (August 2015). In addition, and notwithstanding the fact that the Draft Local Plan seeks to allocate more pitches and plots than is required, the concern is that based on the proposed allocations set in the Sites table on page 123 onwards, land designated as Green Belt is likely to be required to meet any further need. This could lead to a potential conflict with paragraph 83 of the NPPF (local authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period) should an updated TAA not be forthcoming and, in the event that an updated TAA identifies a higher need than the surplus allocated.

- **it would be useful for the Sites table on page 123 onwards to include information on the proposed allocation of pitches I plots for Gypsies, Travellers and Travelling Showpeople where this is part of a larger allocation I mixed-used development**

For example, Site Allocation A24 Slyfield Area Regeneration Project. This will provide clarity to the overall numbers proposed to be allocated, their location and timeframe for delivery.

In addition to those points made previously, the Council would like to take this opportunity to raise two further points in regard to Policies S2 and H1 Homes for all; and the Sites listed in the Proposed Submission Plan.

1. Policy H1 states that Traveller accommodation should be provided on development sites of 500 homes or more whilst there remains an identified need. The Council would therefore query why there is no mention of the provision of pitches I plots on Land to the south and east of Ash and Tongham (Policy A29). The site details show that this is a strategic location proposed for allocation with the provision of approximately 1200 homes. In accordance with Policy H1, four pitches or plots should be provided. If Guildford Borough Council considers that identified need has been met (despite not having an up to date assessment of need up to 2033), we would like to discuss the opportunity for some of our surplus need for Gypsy; Traveller; and Travelling Showpeople pitches I plots to be met across the Borough boundary in accordance with the Government's duty to cooperate.

1. There appears to be a potential discrepancy between the total number of pitches and plots being provided as set out in Policy S2 and within the Sites table on page 123. As noted above, Policy S2 identifies that 73 pitches are required between 2012 and 2027 and 8 pitches are required for Travelling Showpeople. However, the Sites table lists that 82 pitches and 20 plots are to be provided. Firstly, the Council would like some clarification as to these sets of figures. Secondly, should Guildford Borough Council be able to identify sufficient suitable, available, and achievable sites over the required figure both now and in the future, we would welcome the opportunity to discuss whether unmet need arising in Elmbridge Borough could be met through the preparation of the Guildford Local Plan in accordance with the Government's duty to cooperate.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1317  Respondent: 15501377 / Elmbridge Borough Council (Karen Randolph)  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): ()

Guildford borough Proposed Submission Local Plan: strategy and sites (June 2016)

Thank you for consulting Elmbridge Borough Council on Guildford Borough's Proposed Submission Local Plan.

As you know, we are keen to work with you and other authorities within our respective Housing Market Areas to seek to meet needs across the wider area, ensuring the best and most suitable sites are brought forward for development and, that other cross-boundary and strategic planning matters are continuously addressed.

In responding to this latest consultation, we note that a number of the points we previously raised have been addressed. This consultation response therefore focuses on outstanding matters and those which have arisen from examining newly published and updated evidence base documents. Please note we have not been able to review the entire Proposed Submission Local Plan and all supporting evidence base documents in detail. As such, we continue to raise a number of queries I comments on the key topics that are of particular importance to Elmbridge Borough Council.

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

Attached documents:

Comment ID: PSLPS16/5073  Respondent: 15502049 / Paul 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 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: PSLPS16/5075  Respondent: 15502049 / Paul 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): ()

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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:

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Comment ID: PSLPS16/5076  Respondent: 15502049 / Paul Marshall  Agent:

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

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

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

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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?

Attached documents:

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Comment ID: PSLPS16/5078  Respondent: 15502049 / Paul Marshall  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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:

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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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<th>Respondent: 15502113 / Paul Gaffikin</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPP16/10315  Respondent: 15502113 / Paul Gaffikin  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: PSLPP16/10316  Respondent: 15502113 / Paul Gaffikin  Agent:

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

Do you consider this section of the document; complies with 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: PSLPA16/2493  Respondent: 15502177 / Steve Plewis  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

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Comment ID: PSLPS16/5090  Respondent: 15502177 / Steve Plewis  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

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Attached documents:

Comment ID: PSLPS16/5091  Respondent: 15502177 / Steve Plewis  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: PSLPS16/5092  Respondent: 15502177 / Steve Pleewis  Agent:
Table 1: Comments on Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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

Attached documents:

Table 2: Comments on Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Table 3: Comments on Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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Comment ID: PSLPS16/5095  Respondent: 15502177 / Steve Plewis  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: PSLPP16/10323  Respondent: 15502177 / Steve Plewis  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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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: PSLPP16/10324  Respondent: 15502177 / Steve Plewis  Agent:

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

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</table>
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:**

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**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
- Tythebarns Lane to Poi ts1100th Road Birch Close - 8 incidents 2015
  - 15 April 2016 12 year old boy injured in The Street - A 247 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 sec 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 the A3 reaches the A320 Stock Road.

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,DDD. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

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

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

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

Attached documents:

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

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

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

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

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

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

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

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

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

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

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford.
Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (BB).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

**Attached documents:**

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**Comment ID:** PSLPS16/5309  **Respondent:** 15502209 / Shirley Atkinson  **Agent:**

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

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

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

The Plan states the preference is to 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 redkites. 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: PSLPP16/10553  Respondent: 15502209 / Shirley Atkinson  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.

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: PSLPP16/10660  Respondent: 15502209 / Shirley Atkinson  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: PSLPP16/10673  Respondent: 15502209 / Shirley Atkinson  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: PSLPP16/10511  Respondent: 15502209 / Shirley Atkinson  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:

<table>
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<tr>
<th>Comment ID: PSLPP16/10527</th>
<th>Respondent: 15502209 / Shirley Atkinson</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 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 BS) floorspace will be directed to the Industrial Strategic Employment Sites.

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

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

Attached documents:
I OBJECT to 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.

Do you consider this section of 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:

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/10656  Respondent: 15502209 / Shirley Atkinson  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: PSLPP16/10615  Respondent: 15502209 / Shirley Atkinson  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: PSLPP16/10679  Respondent: 15502209 / Shirley Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
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<th>Question</th>
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I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford 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 300 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.

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 Cll 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' 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: PSLPP16/10584  Respondent: 15502209 / Shirley Atkinson  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 12) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the 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:** PSLPP16/10468  **Respondent:** 15502209 / Shirley Atkinson  **Agent:**

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

Do you consider this section of the document; complies 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.

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 to be altered, "there are 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 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 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 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.

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: PSLPP16/10478  Respondent: 15502209 / Shirley Atkinson  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 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

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

Attached documents:

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Comment ID: PSLPP16/10399  Respondent: 15502209 / Shirley Atkinson  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, PoliW 51 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 51 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,

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: PSLPP16/10410  Respondent: 15502209 / Shirley Atkinson  Agent:

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

Do you consider this section of the document; complies with 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.

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 reduced inflation number for housing needs. 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 DAN 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 DAN, 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 DAN are identical because the DAN is "deliverable" and is by definition objective and cannot be contradicted. The DAN 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 DAN 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% ADNB 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.

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

Attached documents:
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 land appears to have 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?
Do you consider this section of the 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:** SQLP16/1350  **Respondent:** 15502209 / Shirley Atkinson  **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: SQLP16/1353  Respondent: 15502209 / Shirley Atkinson  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. 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 ocal 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 GI 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 1
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 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 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 National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. I do not believe the draft plan accords with the NPPF policies on protecting the Green 14. 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 itself very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the
Green Belt and AONB. Each proposed Green Belt site then needs to be considered 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. 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 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.

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

**Attached documents:**

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<th>Comment ID: SQLP16/1354  Respondent: 15502209 / Shirley Atkinson  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): ()

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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<th>Comment ID: PSLPA16/2577  Respondent: 15502241 / Richard Atkinson  Agent:</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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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.
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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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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>Comment ID: PSLPA16/2584  Respondent: 15502241 / Richard Atkinson  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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</table>

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

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

I OBJECT to the Strategic Housing 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?**

**Comment ID:** PSLPS16/5298  **Respondent:** 15502241 / Richard Atkinson  **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 A43aat 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
- Tythebarns Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 15 April 2016 12 year old boy injured in The Street - A 247 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 sec 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 the A3 reaches the A320 Stock Road.

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,DDD. 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: PSLPS16/5307  Respondent: 15502241 / Richard Atkinson  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 (Blc), general industrial (B2) and storage and distribution (BB).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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 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 redkites. 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.

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: PSLPP16/10559  Respondent: 15502241 / Richard Atkinson  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.

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: PSLPP16/10662  Respondent: 15502241 / Richard Atkinson  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: PSLPP16/10671  Respondent: 15502241 / Richard Atkinson  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: PSLPP16/10505  Respondent: 15502241 / Richard Atkinson  Agent:

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

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

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

I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

Attached documents:
**Comment ID:** PSLPP16/10530  **Respondent:** 15502241 / Richard Atkinson  **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:**

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**Comment ID:** PSLPP16/10681  **Respondent:** 15502241 / Richard Atkinson  **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 recognise 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 This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

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

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

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

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

Attached documents:

Comment ID: PSLPP16/10653  Respondent: 15502241 / Richard Atkinson  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 Guildford Town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

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

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

The policy also fails to provide guidance on design requirements, as required by the NPPF.
The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

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

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

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

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

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

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

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

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

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

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Do you consider this section of the document; complies with 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 housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/10578  Respondent: 15502241 / Richard Atkinson  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. 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 Cll 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' quality of life will 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 reduced funding. 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: PSLPP16/10587  Respondent: 15502241 / Richard Atkinson  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 12) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are likely 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.

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.

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 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 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 to be altered, the development at Garlick's Arch to be altered, the development at Wisley Airfield to be altered, the development at Gosden Hill Farm to be altered. 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:** PSLPP16/10689  **Respondent:** 15502241 / Richard Atkinson  **Agent:**

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

Do you consider this section of the document; complies 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.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing 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.

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: PSLPP16/10486  Respondent: 15502241 / Richard Atkinson  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 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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

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

**Attached documents:**

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**Comment ID:** PSLPP16/10400  **Respondent:** 15502241 / Richard Atkinson  **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, PoliW 51 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 51 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,

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: PSLPP16/10407  Respondent: 15502241 / Richard Atkinson  Agent: 

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

Do you consider this section of the document; complies with 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.

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 reduced inflation number for housing needs. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised.

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 DAN 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 DAN, 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 DAN are identical because the DAN is "deliverable" and is by definition objective and cannot be contradicted. The DAN 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 DAN 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% ADNB 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.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10414</th>
<th>Respondent: 15502241 / Richard Atkinson</th>
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<tbody>
<tr>
<td>Document: 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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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 appeal 11a 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:** SQLP16/1348  **Respondent:** 15502241 / Richard Atkinson  **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: SQLP16/1351  Respondent: 15502241 / Richard Atkinson  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: SQLP16/1352  Respondent: 15502241 / Richard Atkinson  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. 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 ocal 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 GI 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 1
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 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 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 National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. I do not believe the draft plan accords with the NPPF policies on protecting the Green 14. 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 itself very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered 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. 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 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.
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 cooperate 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 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: PSLPS16/5096  Respondent: 15502305 / S. Gibbs  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: PSLPS16/5097  Respondent: 15502305 / S. Gibbs  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: PSLPS16/5098  Respondent: 15502305 / S. Gibbs  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?

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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?

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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?

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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 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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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.

I object to the GBC removing the green belt status behind St Bedes School and near the Canal in Send this is vital green space for the village and must be put back as green belt to prevent developers incursion into our vital 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:** PSLPS16/5104  **Respondent:** 15502433 / Jill 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): ()

I OBJECT to the proposals for Gosden Hill because they breach the Green Belt, put West Clandon in danger of being joined up to Guildford and will generate excessive extra traffic for Send.

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

Attached documents:

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**Comment ID:** PSLPS16/5105  **Respondent:** 15502433 / Jill Murphy **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 because they breach the Green Belt, the housing numbers are excessive, damage would be caused to the Surrey Hills AONB and excessive extra traffic would be inflicted on Send.

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

Attached documents:

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**Comment ID:** PSLPS16/5103  **Respondent:** 15502433 / Jill Murphy **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I OBJECT to Wisley Airfield, which is classified as a brownfield site on a spurious technicality when everybody can see that it is not what is understood by brownfield, being included in the Local Plan as a development site for 2000 houses when Guildford Planning Committee have just refused the planning application relating to it. Either the left hand does not know what the right hand is doing or this is a devious diversion. I object for all the reasons identified by GBC Planning Committee when it rejected the application.

I OBJECT to building 2000 houses at what GBC calls Wisley but is actually at Ockham, because it would massively and detrimentally overwhelm Ockham village, East and West Horsley and the entire neighbouring area. The proposal is ill conceived, showing scant regard for the Green Belt, infrastructure requirements, transport, or pollution and lacking nearly all the evidence that is needed to show that such a development would be sustainable.

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

Attached documents:

Comment ID: PSLPS16/7866  Respondent: 15502433 / Jill Murphy  Agent:

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

I OBJECT to building 45 houses at Clockbarn Nursery. There is inadequate access and high local traffic volume. Planning permission has been given for 64 apartments at the Tannery and for building the Marina. This will generate additional heavy traffic. By adding another 45 houses, this will greatly add to the traffic already there it will be even more gridlocked. The junction with Send Road is already very dangerous for vehicles joining the Main Road, this proposal will make it far more dangerous.

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

Attached documents:

Comment ID: PSLPS16/5102  Respondent: 15502433 / Jill 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): ()

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 houses at Wisley Airfield, 2000 at Gosden Hill and 1850 at Blackwell Farm as well as 485 from Send itself. This is in addition to what it takes at the moment. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would face gridlock. This would exacerbate noise and pollution levels which are already excessive and is wholly unacceptable.

I OBJECT to the new interchange with the A3 at Burnt Common because it is being presented as a way of facilitating the movement of a massive increase in vehicles whereas in reality it would cause havoc on the A247 and the many feeder roads in Ripley and Clandon in addition to Send.

I OBJECT to the fact that Guildford Councillors approved the Local Plan before the Transport Assessment had even been published which indicates what scant regard they had for the traffic implications which are at the forefront of residents’ worries. They have to contend with the problem every day in terms of delays, pollution and noise which are already destroying our villages as decent places in which to live.

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

Attached documents:

Comment ID: PSLPS16/7867  Respondent: 15502433 / Jill 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): ()

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. You do not in fact need at all 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 be in addition to the congestion that there already exists around this area and getting the developers to bribe SCC with a new junction will only add to the congestion by pulling in extra traffic trying to access the A3.

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

Attached documents:

Comment ID: PSLPS16/7869  Respondent: 15502433 / Jill Murphy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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<td>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.</td>
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<td>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.</td>
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I OBJECT to GBC withholding from residents their consultant’s and sub-consultant’s calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.

Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 0.5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford’s projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

I OBJECT to the combined total of 2000 (Wisley) + 485 (Send) + 2000 (Gosden Hill) + 1850 (Blackwell Farm) houses all alongside a short stretch of the A3 between the M25 and the university. To concentrate 6335 of the borough’s assessed need for housing of 13860, that is close to half of it, in such a small area of the borough is by any standards unreasonable. If GBC wants to build this number of houses, which has more to do with developer pressure than properly calculated need, it should spread them more evenly throughout the borough, which it is manifestly failing to do. This would help to alleviate excessive traffic congestion and pollution which is a certain consequence of GBC’s current proposals.

Applied specifically to Send, although it is the largest village in the borough it should not have to take a significantly higher proportion of new houses than the borough overall. It should also not have to take a significantly higher proportion of new houses on account of its current size which arises as a result of a disproportionate volume of housing previously being located in Send, Send Marsh and Burnt Common. When the Wimpy Estate of several hundred houses (Linden Road, Maple Road and all adjacent “tree” roads) was built in Send some 40 or more years ago it represented a massive increase in the size of Send Marsh which increase at the time was disproportionate to the size of the village and its amenities. A further massive increase now, which relates numbers proposed to numbers existing, compounds the offence. It would be more equitable to say that as Send accepted a very large number previously, it should not be expected to do so again.

The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. I therefore repeat the points made in paragraph 11 above which cannot be over emphasised. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

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

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Do you consider this section of 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 Objections

I OBJECT to the Local Plan because it seeks to build on Green Belt land unnecessarily. The work of Professor Anne Power at the London School of Economics, amongst much other expert research, clearly demonstrates that there is more than sufficient land to build all the houses that are needed without taking any of the Green Belt. In our area several studies show that unused brownfield sites in Guildford Town itself are capable of yielding most of the required land. GBC has not properly explored the capacity which is available there or on brownfield sites elsewhere in the borough, which would have provided a sensible starting point since GBC own many of them.

I OBJECT to the Local Plan in that GBC’s approach to the Green Belt introduces a concept of grading its quality. This is an alien concept, not recognised in law. Of course some Green Belt is seen to be better than other Green Belt but the law does not make any distinction, nor should it. It depends who is looking at it and from what standpoint they are looking. Green Belt is Green Belt and it is not for GBC to stand in judgement on what bits it thinks are worth keeping and what are not.

I OBJECT to proponents of the plan representing those against it as “nimbys”. Those against are not against building houses. They recognise the need for them. They are against building them in unsuitable, unthought out locations which damage existing amenities. This relates particularly to building them on Green Belt land, thereby destroying an existing amenity, when it is not necessary to do so.

I OBJECT to the Local Plan because it seeks to promote sites for houses with woefully inadequate attention being paid to the infrastructure to support those sites. Without proper infrastructure none of the identified sites will deliver what is claimed for them. No detailed thought has been given to the form of the infrastructure required, still less to how much it would cost and, it would appear, none at all to where the money for it would come from.

I OBJECT to removing Send and other villages from the Green Belt. The Green Belt was intended to be permanent, and its permanence was enshrined in law through the National Planning Policy Framework, reinforced by the NPPG and a succession of Ministerial guidance statements. For all of this to be overridden requires “special circumstances” which do not exist in the case of Send.

I OBJECT to all four proposed sites in Send because they are all in the Green Belt and not one of them displays the very special circumstances which would be needed in order to outweigh the substantial harm caused by reason of inappropriateness. There is abundant legal authority but I would cite the Court of Appeal cases of City of St Albans v Hunstan Properties and Gallagher Homes v Solihull Metropolitan Council. These precedents, which have been ignored by Guildford Council before, show that it is necessary to demonstrate that harm to the community at large, by taking the Green Belt, would be less than if it was not taken. The crucial words are “to the community at large”. Paragraph 47(1) of the NPPF advises local authorities “to ensure that their local plans meet the full, objectively obsessed, needs for markets and affordable housing in the housing market area as far as is consistent with the policies set out in this framework”. As the Court of Appeal has made clear one cannot rely on objectively assessed needs without having regard to the policy constraints. The qualification in this clause “as far as is consistent with” is not qualifying housing need; it is qualifying the extent to which the local plan should go to meet those needs. It is quite clear from the precedents that exceptional circumstances will not exist unless the potential harm to the Green Belt has been shown to be clearly outweighed by other considerations. In other words harm to the Green Belt is included in the factors which the NPPF requires to be taken into account.

The NPPF further states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection
of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. The draft plan has not begun to demonstrate that there are exceptional circumstances and indeed offers very little to suggest that the authors have even read what the Court of Appeal has said about the provisions in the NPPF.

It is noted that the Court of Appeal precedents have been ignored before by GBC, which appears to regard itself as over and above the law. GBC seems willing to expend residents’ funds on counsel’s advice, in support of what its client developers want to do, but cannot bring itself to get a QC’s opinion in order to guide it on understanding the case law that actually exists, which manifestly it does not understand.

Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt. But if Guildford wants to match the housing target which would apply if it was not constrained by the Green Belt, it can still do so using brownfield land which is in plentiful supply. It is difficult to avoid the conclusion that it has not taken either of these legitimate routes because it finds the allure of developers’ propositions on green field sites more attractive. GBC should also note that the Green Belt was created not just for the benefit of local residents. It came to be known as the Metropolitan Green Belt because it was intended to be of benefit to a much wider range of people, especially Londoners visiting open spaces outside but near to London. It is beyond the remit of GBC to arrogate to itself the power to override Parliament’s intention.

I OBJECT to any sort of diminution of Send’s Green Belt because it provides an essential buffer stopping Woking and Guildford becoming one conurbation. It has served this purpose effectively since its inception and should continue doing so for the benefit of subsequent generations living here. No group of councillors, especially without a mandate, has the authority to impose a different future on residents.

I OBJECT to any reduction in Send’s Green Belt because so much land in Send provides the setting for the beautiful Wey Navigation corridor, which is a conservation area that enhances biodiversity, is visually important, provides a valuable leisure facility and combined with the surrounding lakes an exceptional habitat for a wide range of bird species and other wildlife.

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

Attached documents:

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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 (Mr) 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](https://example.com) (260 KB)

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**Comment ID:** pslp172/3570  **Respondent:** 15502433 / Jill Murphy  **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 CLOCKBARN NURSERY TANNERY LANE POLICY A42 because:

Increasing the homes from 60 instead of 45 is an increase of 33% is far too many.

Why have all the previous objections been ignored and then you have added to the number of houses?

The Junction of Tannery Lane and the A247 are at gridlock, lots of times each day at present, and coming out from this junction is VERY DANGEROUS.

Adding any houses to Tannery Lane would add to the danger but 60 houses with say another 120 vehicles as well as delivery vans will give constant gridlock, and accidents.

It will add to the existing surface water flooding.

As a boat user on the River Wey Navigation it will detract from the lovely views from this Canal.

It will further erode our precious Green Belt, which the Government is Committed to keep.

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

Attached documents:

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**Comment ID:** pslp172/3571  **Respondent:** 15502433 / Jill Murphy  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY A 43 because:

It ignores thousands of previous objections made by us local people.

It will cause even more traffic congestion, which is dreadful already, gridlocking the Roads in and out of Send and Ripley.

It will fill in the gap between Send Marsh and Ripley, so defeating the purpose of the Green Belt.

It will cause over development of our village and this number of homes is excessive.

There are NO "exceptional circumstances" existing to use our precious, beautiful Green Belt Land.

The beautiful Ancient Woodland in this site has been there since Elizabeth the First and must be protected for future generations.

Being a flood zone 2 allocation it is prone to frequent flooding, so the surface water will be moved onto the lower ground where I live.

There is a clay pigeon shooting site here which has polluted the ground with lead shot for over 50 years.

There is NO PROVEN demand for Traveling Show people plots here.

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

Attached documents:

Comment ID: pslp172/3573  Respondent: 15502433 / Jill Murphy  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 in the 2014 plan because of so many objections were made.

There is no need to build industrial or warehousing development IN THE MIDDLE OF THE PRECIOUS GREEN BELT when Slyfield and Guildford have EMPTY sites and industrial units.

The 2017 Employment Land Need Assessment shows a REDUCTION in demand to 3.9 hectares for industrial use in the whole Borough NOT a huge allocation of 10 hectares at SEND IN THE GREEN BELT.

The resultant GRIDLOCK in the already very congested local roads from car and heavy transport would be a disaster for local Send residents.

AGAIN this will join up local villages thus defeating the object of our precious Green Belt.

The WORD MINIMUM has been craftily changed from the previous MAXIMUM in the 2016 plan and since then there has been a large decline in demand for industrial 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): ()

I OBJECT TO THE PROPOSAL TO INSET SEND BUSINESS PARK FROM THE GREEN BELT BECAUSE:

Further expansion of development of this location detracts from the intended openness of our Precious GREEN BELT, and is totally inappropriate.

It is an Old Non Conformer user in an area of outstandingly beautiful countryside adjacent to the lovely River Wey Navigation Canal.

Tannery lane is a twisty narrow country lane with very restricted vehicle use in both directions.

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): ()

Major doubts concerning housing numbers - The inflated number of new houses proposed arises from a SHMA that has not been shared as part of the local plan. This SHMA target housing number if further increased by GBC to give a population increase which is almost 70% higher than 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:
I am writing to object to the proposed local plan for the Horsley villages. I live in East Horsley and object on the following points:

1. **Removal of the Horsleys from the Green Belt** – The Green Belt was put in place to stop towns and villages running into huge unbroken settlements. I feel it is wrong for our council to over-turn a national environmental protection scheme to meet inflated housing quotas. The removal of the Horsleys is an arbitrary decision with no logical basis and is a needless destruction of a historic village. The national plan states that Green Belt land may be removed in ‘exceptional circumstances’. No exceptional circumstances have been presented within the plan to justify this act. Building on Greenfield sites in the UK is significantly cheaper than developing Brownfield sites and the decision to build large tracts of houses rather than infilling or developing these smaller sites is purely economic. Developing smaller sites is good for the local economy, supporting local developers and generating sustainable jobs in the local area. Large developments will import labour and export profits.

2. **Significant changes to the character of the village** - The plan aims to build 593 new houses within the Horsleys and a further 2000 between the Horsleys and the A3 at Wisley Airfield. The national plan definition for Green Belt infill states that gaps in housing within villages can be in-filled and villages can be expanded so as not to alter their character. I have no objection to this sensible approach to development within the village and recent developments including the development near the Horsley railway station have been in keeping and at a scale which does not alter the village character. The proposed plan would irreversibly alter the character of the village, increasing the number of houses and population by over 50%, turning what is a busy and thriving village into a gridlocked satellite town with insufficient amenities and infrastructure.

3. **Infrastructure concerns** – Despite living in East Horsley only a short distance from the Raleigh school, my oldest son was ineligible for a place in reception, as the school was filled from a catchment less than a mile from the school. If we have an additional 600 houses, or roughly 600-1200 children, the pressure on places will be even more extreme. Ockham Road south, the major thoroughfare of East Horsley is already overloaded and leads to significant queues at rush hour to get through the village and onto the A246. This leads to people taking huge risks to get onto the 246, as they are so fed up they pull out just in front of oncoming traffic. It is a major accident waiting to happen. Also, the road is so narrow that when a bus and a lorry meet on this road, it all comes to a grinding halt which results in significant congestion and pollution in the village. The plan aims to build an additional 3000 homes within a 3 mile radius of the Horsley’s and the current road system is just not able to cope with this additional load. There is no indication of how construction would occur (how many additional lorries)?

Horsley station car parks are already full and cannot deal with increased numbers. Trains to Waterloo are full and adding an additional station and houses will just add to this issue. There is not sufficient capacity on the Guildford-Surbiton-Waterloo rail network to cope with the additional housing. It only takes one late train on a weekday morning to cause chaos on this route leading to dangerous overcrowding of trains and platforms. I do not see this addressed in the plan at all and therefore it lacks understanding of basic infrastructure needs.

Adding slip roads to the A3 will further increase congestion. The junction with the M25 is a dangerous intersection and adding a slip road in this area will cause additional accidents with traffic filtering onto congested inner lanes with

1. **Major doubts concerning housing numbers** – The inflated number of new houses proposed arises from a SHMA that has not been shared as part of the local plan. This SHMA target housing number if further increased...
by GBC to give a population increase which is almost 70% higher than official national estimates for population growth in the borough. There is simply no need for the number of houses projected.

1. **Flooding** - During the heavy winter rains we have experienced over the past couple of years the Horsley area has suffered with terrible flooding, which particularly affect the main roads though the village which all flood. With additional building and additional cars, this issue and the congestion it causes will get much worse. Storm water management in the area is at capacity and I have personally witnessed backup of sewer systems and the forcing off of drain covers due to the lack of capacity for rain events. This causes polluted discharge into the local rivers from the sewer system leading to long term environmental damage. The increased housing will further reduce the permeable surface, even considering modern paving and surfacing technology. Much of this excess peak flow will end up in local streams and rivers and significantly increases the risk of flash floods, maybe not in our borough, but certainly in those downstream.

1. **Designation of East Horsley as a ‘District Centre’** - I understand that a district centre can be described as 'a LARGE group of shops, together with supporting non-retail facilities and services. They normally feature not less than 50 units'. We are a village with a handful of shops and therefore should not be classed as a district centre. The parking in the village for shopping consists of a single row of spaces in front of the shops and an area for around 4 cars to the side of the Budgens store. This area is already congested and increasing demand by 50% would cause gridlock in the village.

1. **Plan omissions** - Within the local plan I would expect to see a vision for sustainable growth which includes the infrastructure required to support the proposal and the impact on peoples health and the environment. The current plan is about meeting housing quotas which are at the top end of forecasts, with no thought for the impact of the proposal on the environment or on the people living in these areas. There is no clear plan on how capacity for water, waste water, and electricity will be met and the impacts to storm water management within the borough and the incidental impacts to other boroughs such as Elmbridge and Mole Valley through increased instantaneous river volumes. I would like to see average traffic volumes and speeds forecast in the plan and the resulting impact to air quality and life expectancy for local residents especially those suffering from COPD and asthma. The implementation of this plan will lead to higher incidence of environmentally triggered respiratory disease and will decrease the overall appeal of living in the Guildford area. If you envisage the future with this plan implemented in the Horsleys you will see a grid-locked, polluted suburb where there was once a very pleasant community.

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

**Attached documents:**

**Comment ID:** PSLPP16/11808  **Respondent:** 15502465 / Mark Bourner **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):** ()

**Significant changes to the character of the village** - The plan aims to build 593 new houses. The national plan states that gaps in housing could be infilled but the proposed plan would irreversibly alter the character of the village, increasing the number of houses and population by 50%.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPP16/11813  Respondent: 15502465 / Mark Bourner  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): ()

**Designation of East Horsley as a ‘District Centre’** - I understand that a district centre can be described as 'a LARGE group of shops, together with supporting non-retail facilities and services. They normally feature not less than 50 units'. We are a village with a handful of shops and therefore should not be classed as a district centre.

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

**Infrastructure concerns** - Despite living in East Horsley only a short distance from the Raleigh school, my oldest son was ineligible for a place in reception, as the school was filled from a catchment less than a mile from the school. If we have an additional 600 houses, or roughly 600-1200 children, the pressure on places will be even more extreme. My other major concern is the pressure on the road system. Ockham Road south, the major thoroughfare of East Horsley is already overloaded and leads to significant queues at rush hour to get through the village and onto the A246. This leads to people taking huge risks to get onto the 246, as they are so fed up they pull out just in front of oncoming traffic. It is a major accident waiting to happen. Also, the road is so narrow that when a bus and a lorry meet on this road, it all comes to a grinding halt which results in significant congestion and pollution in the village. The plan aims to build an additional 3000 homes within a 3 mile radius of the Horsley’s and the current road system is just not able to cope with this additional load. There is no indication of how construction would occur (how many additional lorries)! Finally, our trains station car parks are already full and cannot deal with increased numbers.

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

Attached documents:
**Comment ID:** PSLPP16/11807  **Respondent:** 15502465 / Mark Bourner  **Agent:**

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

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

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

**Removal of the Horsleys from the Green Belt** - The green belt was put in place to stop towns and villages running into huge unbroken settlements. I feel it is wrong to just arbitrarily decide that it now suits the council to change the green belt, therefore our village is being removed. It is also against the policy that says ‘exceptional circumstances’ are required to make this change. There are no exceptional circumstances that have been provided to justify this change.

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

Attached documents:

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**Comment ID:** PSLPP16/11811  **Respondent:** 15502465 / Mark Bourner  **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** - During the heavy winter rains we have experienced over the past couple of years the Horsley area has suffered with terrible flooding, which particularly affect the major roads though the village which all flood. With additional building and additional cars, this issue and the congestion it causes will get 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:** PSLPA16/2496  **Respondent:** 15502497 / Karen Young  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing in the strongest terms possible to voice my objection to the proposed plan for the new housing development sites in East and West Horsley. I have lived in West Horsley for 20 years – my husband and I moved to the village as we considered the area to be one of outstanding natural beauty where we could bring up our family in a safe, pollutant free environment. During the time that we have lived here, there have been a substantial number of new houses being built which, generally speaking, have been sympathetically developed on land which had previously had housing or by extending plots within established gardens – as has been seen on our road – Nightingale Crescent where 2 new houses were built.

The suggestion that the Horsleys’ require the number of new houses proposed is ridiculous. The local amenities are just about coping with the number of residents currently housed in the two villages. Without significant input into increasing the local amenities – such as schooling, doctor’s surgery, dentists etc the two villages cannot sustain any further increase in the population. Our local roads are already under increased pressure from the daily number of vehicles and again without a significant amount of investment into their upkeep, the road surface will getting increasingly worse.

We fondly refer to East and West Horsley as being beautiful caring villages – the new proposed plan would create a monstrous sprawling housing estate – a far cry from the countryside village that we moved to in 1996. I love where I live and I certainly don’t wish for the Horsleys to change in anyway!

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

Attached documents:
Any additional housing would lead to a further increase in the number of cars using the local roads. The proposal to build circa 2000 houses on the Wisley Airfield site would increase daily car usage to between 2000 and 4000 vehicles which would lead to further delays and frustration for all road users.

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 represent the owners of an international horticultural business in Cobham which owns land in Cobham and Ockham. Our Ockham site is very important for the development of the business and there are regular movements between the two sites of Tractors and cultivation and/or harvesting equipment. We also have vehicle movements between the two sites moving commercial stock.

We object very strongly to the re-inclusion of the Former Wisley Airfield/ Three Farms Meadows site into the Borough Local Plan after it was rejected as a suitable site for housing by the full planning committee and the planning department of the Borough.

We object to the plan’s proposal to remove the Wisley airfield / Three Farms Meadows from the green belt and we also strongly object to the similar proposals to build on green field sites in the Parish’s of East and West Horsley, Send and Ripley, and to the removal of these parish’s or parts of them from the Green Belt.

We object to the loss of the Agricultural land at The Farms Meadows through the proposed development there. Good agricultural land is a declining resource.

We object to the proposed development of the various sites in the parish’s of East and West Horsley, Ockham, Ripley and Send because they cannot happen without a big investment in services and this major requirement is hardly mentioned. Already the district is struggling with overflowing sewerage, with shortages of other utilities of Gas, water and electricity supplies. There is already a desperate shortage of school places for all age groups in this area of Surrey; Medical services are also fully stretched and inadequate for more clients. The Hospital will need to expand too.

We object to the proposals to increase the number of houses in this area by such a large amount on an annual basis. The road infrastructure is inadequate. The roads were developed in the days of the horse and cart, are narrow and cannot be widened easily because they are bounded by hedges. There are few footpaths and no cycle lanes or lighting. The mix of pedestrians, cyclists and ridden horses with fast cars and trucks are a recipe for disaster and litigation if no planning consideration was made. Due to the high traffic movements and the high number of goods vehicles using these lanes they are now breaking up. The area has some of the worst roads in the county.

We object to the proposed development of the Former Wisley Airfield on health grounds in that the site is very close to the major trunk roads of M25 and A3 and junction 10 of the M25. I have personally experienced discomfort due to the air pollution engendered by the traffic when walking on Ockham Common which is very close to the site when the wind is from the North round to the South East.

I object strongly to the development because of its likely affect on the Wisley and Ockham commons, part of the Thames Basin Heaths Special Protection Areas, particularly considering atmospheric pollution, increased footfall and dog exercising on these fragile environments. We object to the cavalier attitude of the planning department, the planning committee and their subcontractors in devising a housing need without consideration and planning for the infrastructure needed to establish their proposals. If it were a business making such poor plans they would quickly lose their money and become bankrupt. We object as taxpayers that we would have to bear the financial consequences of the planning.
We strongly object to the proposals because of the effect on the picturesque villages which have a high number of old and historic houses, many listed. The proper development of The Borough should be to increase the number of high rise buildings in the centre, not that Guildford is a city, with schemes such as the station development, lesser rise building should be encouraged in the suburbs of Guildford. We object to the lack of planning for work and employment for the residents of these developments. They cannot all take the train to London.

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

Attached documents:

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Comment ID: SQLP16/1318  Respondent: 15502785 / Susan Watts  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 am writing to object to the 2016 Draft Local Plan on the grounds of (i) the limited consultation period and (ii) it appears to be unsound in a number of key aspects.

On reviewing the document it appears the plan is unsound because there is a lack of evidence for the alleged housing need which in turn has led to the proposed disproportionate level of development on one area of the Borough.

Additionally, there is a lack of specific detail concerning the essential infrastructure to support all the proposed development stated in the above Draft Plan especially as there is an acknowledged existing deficit already.

Furthermore, there appears to be a total disregard for the potential loss of Green Belt.

Therefore, as a result of the poor quality of the draft plan it appears to be total unsound for it’s proposed purpose and so should be re-considered and drafted.

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

Attached documents:

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Comment ID: PSLPA16/2500  Respondent: 15502817 / Linda Margaret Cutbush  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:

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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:

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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 will happen for doctors, dentists and schools? It is bad enough already.

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

Attached documents:
**Comment ID:** PSLPS16/5119  **Respondent:** 15502817 / Linda Margaret Cutbush  **Agent:**

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

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

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

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

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.

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

Why is it deemed necessary for a 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 existing successful rural businesses, which have been there for 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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**Comment ID:** PSLPS16/5119  **Respondent:** 15502817 / Linda Margaret Cutbush  **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:

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**Comment ID:** PSLPP16/10354  **Respondent:** 15502817 / Linda Margaret Cutbush  **Agent:**

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

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

I object 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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Do you consider this section of the document; 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 in very poor condition and have little or no footpaths. 5000 more houses means dangerous and unsustainable traffic.

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

Attached documents:

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Do you consider this section of the document; complies with 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: PSLPP16/10357</th>
<th>Respondent: 15502817 / Linda Margaret Cutbush</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)
The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

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

Attached documents:

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<th>Comment ID: PSLPP16/10355</th>
<th>Respondent: 15502817 / Linda Margaret Cutbush</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 poor air quality concerns (Policy I3)
The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

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

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

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

Attached documents:

Comment ID: PSLPP16/10353  Respondent: 15502817 / Linda Margaret Cutbush  Agent:

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

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

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

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

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 plans are there for south of Guildford?

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

Attached documents:

Comment ID: SQLP16/1319  Respondent: 15502913 / Lesley Leheup  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): ( )

These comments on the Guildford Local Plan I agree with and wish them to be lodged on my behalf.

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

Attached documents: EHPC_Local_Plan_Response_13.06.16 (2).pdf (278 KB)
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2505</th>
<th>Respondent: 15502977 / Alexandra Morton</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 lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum</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 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</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: PSLPS16/5123</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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 A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</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 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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5126</th>
<th>Respondent: 15502977 / Alexandra Morton</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

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:

<p>| Comment ID: PSLPS16/5128 | Respondent: 15502977 / Alexandra Morton | 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>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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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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**Comment ID:** PSLPP16/10366  **Respondent:** 15502977 / Alexandra Morton  **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:** PSLPP16/10362  **Respondent:** 15502977 / Alexandra Morton  **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:** PSLPP16/10364  **Respondent:** 15502977 / Alexandra Morton  **Agent:**

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

Do you consider this section of the document; complies with 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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<th>Comment ID: PSLPA16/4543</th>
<th>Respondent: 15503041 / Anne Williams</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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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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| Horsley and the surrounding areas are quiet rural villages and we are FULL. The roads in Horsley are constantly being repaired due to all the pot holes caused by too much traffic.  
The Medical Centre is full, the schools are full and the trains are full during rush hour. There will be insufficient parking space and our Bus service is inadequate.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

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| I strongly oppose and object to a Major Building Programme in Horsley and on the old Ripley Airfield.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

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<th>Comment ID: PSLPP16/10369</th>
<th>Respondent: 15503041 / Anne Williams</th>
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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/5148  Respondent: 15503105 / Beml Evans  Agent:

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

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Comment ID: PSLPS16/5159  Respondent: 15503105 / Beml Evans  Agent:

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

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Comment ID: PSLPS16/5160  Respondent: 15503105 / Beml Evans  Agent:

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

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Comment ID: PSLPS16/5161  Respondent: 15503105 / Beml Evans  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

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Attached documents:

Comment ID: PSLPS16/5162  Respondent: 15503105 / Beml Evans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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Comment ID: PSLPP16/10374  Respondent: 15503105 / Beml Evans  Agent:

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

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

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Attached documents:

Comment ID: PSLPP16/10375  Respondent: 15503105 / Beml Evans  Agent:

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

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

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Comment ID: PSLPP16/10397  Respondent: 15503169 / A Palitchell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10398  Respondent: 15503169 / A Palitchell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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<th>Agent: Harriet Richardson</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
## 1. INTRODUCTION

1.1 Guildford Borough Council (GBC) is producing a new Local Plan to cover the plan period 2013 to 2033 and guide development within the borough whilst also complying with the principles and wider national policies identified within the National Planning Policy Framework (NPPF).

1.2 These representations are made as part of the Regulation 19 to the public consultation for the Proposed Submission Local Plan.

1.3 The representations relate to Land to the west and south west of Fairlands – ‘Land adjoining Fairlands, Guildford’ which was identified in the former Draft Local Plan Document as a ‘safeguarded’ site under Site Allocation 1. The site has not been taken forward as an allocation in the Proposed Submission Local Plan.

1.4 This statement provides a site summary and a review of Policy 2 of the borough wide strategy. It then addresses reasons why the land at Fairlands should be allocated for housing development in the Submission version of the Local Plan, covering issues such as housing requirements, the 5 purposes of the Green Belt and the questionable deliverability of large scale strategic sites that have been included in the Proposed Submission Local Plan.

## 2. Site Summary

2.1 The land to the west and south west of Fairlands has been identified on the map below:

![Image 1: Site Location plan](image1.png)

2.2 The land adjoining Fairlands, Guildford’ was identified in the former Draft Local Plan Document as Site Allocation 11.

2.3 The site was also identified in Volume III of the Green Belt and Countryside study as providing opportunities to accommodate development without significantly compromising the purposes of the Green Belt. The parcels of land identified as H8-A H8-B (former allocation 118) have a capacity of circa 500 dwellings. The site is well related to existing services such as a local service centre, a doctor’s surgery and bus routes located within Fairlands, which is a residential area in character. The site provides the opportunity for a natural extension to the residential area of Fairlands on a contained site which is surrounded by defensible boundaries and tree cover.

2.4 This site is deliverable and available now. It is within a single ownership and as it was last in agricultural and equestrian use there are no constraints to the site coming forward for residential development. The site is achievable, it is capable of being delivered within five years and is entirely viable.

2.5 Fairlands uniquely is capable of accommodating an on-site SANG to mitigate the impact of any development upon the Thames Basin Heaths. The developable area is shown edged red on Image 1 and the proposed SANG land is edged blue and hatched. We have discussed this with Natural England who have advised that this could be bespoke SANG land to support the development.

2.6 There is an existing access to Littlefield Manor and the land shown hatched brown on Image 1 will be used as a principle access road to the development land from the A323 Aldershot Road.
2.7 Fairlands is a sustainable settlement, with a number of services including a school, doctor’s surgery, post office, community centre and shops. Fairlands is located just 2 miles from Guildford, providing access to a range of quality services and infrastructure. It is therefore a wholly sustainable location for development.

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

Attached documents: 2016-07-15 written reps to Proposed Submission Local Plan HR FINAL.pdf (453 KB)


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

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

4 HOUSING LAND SUPPLY

Annual Monitoring Report

4.1 The recent Annual Monitoring Report (AMR) published in October 2015 to assess the period of 2014-2015 showed that net completions that year had been just This is an under delivery of 80 dwellings against the interim housing figure and an under delivery of 451 units when assessed against the annual housing target for the plan period identified in the Proposed Submission Local Plan. The previous interim housing figure of 322 dwellings per annum agreed on May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. The phased delivery of housing proposed will further exacerbate this issue.

4.2 The AMR 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 demonstrates the need in the district for large scale strategic sites such as the land adjoining Fairlands. These representations therefore identify the key reasons why the site should be considered appropriate for housing and should be reinstated in the Local Plan for removal from the Green Be Paragraph 83 of the NPPF addresses removal of land from the Green Belt and states that boundaries ‘should only be altered in exceptional circumstance’. The current under delivery of housing is considered to be an exceptional circumstance and as a result Green Belt land such as the site at Fairlands should continue to be considered as an allocation site in the final Local Plan.

5 Year Housing Land Supply

4.3 The NPPF addresses the matter of housing land supplies in Paragraph 47 which stipulates 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%. ’ It goes on to state that where there has been persistent under-delivery of housing in the district or borough, LPAs should increase the buffer to 20%. It is clear that GBC cannot currently demonstrate a 5 year housing land supply with in the region of only 4-2.5 years supply being currently identifiable. This will continue to be the case if GBC adopt the phased process identified in table 1 of this report.

4.4 The level of under delivery of housing is also likely to perpetuate as inward migration from the London Boroughs continues. Much of the SHMA is based on figures from 2012 which are now out of date and no longer accord with the
population projections supplied by the Office of National Statistics (ONS) which show that by 2037, the population of Surrey is expected to increase by over 200,000.

4.5 It is therefore considered essential that previously identified deliverable sites, such as the land at Fairlands are included in the final Local Plan document as development allocations.

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

**Attached documents:**

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**Comment ID:** PSLPS16/5209  **Respondent:** 15503265 / Harriet Richardson  **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? ( )

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7 CONCLUSION

7.1 It is acknowledged by GBC that it does not have a five year land supply against the OAN target of 693 dwellings per annum. This is exacerbated by a continuous under delivery of development in recent years, as well as the proposed phased approach taken by GBC to backload the housing delivery to the later part of the plan period.

7.2 There is an evident housing shortage in the borough in the immediate term and a reliance upon some sites which have serious deliverability constraints has the propensity to exacerbate this defi. In addition, the Local Plan recognises that Green Belt land will need to be developed in order to meet the OANs for the borough. In light of this, there is no rationale for the removal of Fairlands Land from the Local Plan as a former proposed allocation site. The land is available and deliverable, and capable of assisting in meeting the current pressing housing need, particularly as the former proposed allocation removed the site from the Green Belt.

7.3 GBC has identified at least two major strategic sites which are anticipated to deliver circa 3,000 dwellings to assist in meeting the 693 dwelling per annum figure, that have significant deliverability problems. Simultaneously GBC has removed the land at Fairlands which is capable of delivering circa 500 dwellings if released from the Green Belt as previously proposed in the Draft Local Plan. On this basis, the land to the west and south west of Fairlands should be allocated as a development site to assist in meeting the borough’s OAN and allowed to provide certainty in the event that any of the currently identified sites fail to come forward.

7.4 There can be no justification for an authority which has an immediate housing deficit, a lack of genuinely deliverable sites and Green Belt constraints to backload such significant proportions of projected housing delivery to the later stages of the plan period. Land adjoining Fairlands had previously been identified as suitable for release from the Green Belt, it is available and it is deliverable now. The site should, therefore, be introduced as an allocation for residential development during the current plan period.

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

**Attached documents:**

---

**Comment ID:** PSLPS16/5202  **Respondent:** 15503265 / Harriet Richardson  **Agent:**
5 DELIVERABILITY OF STRATEGIC SITES

5.1 GBC anticipates that there are a number of sites within Guildford that can come forward within either 5 or 11–15 years. Whilst there may be a number of sites within the settlement that could be capable of coming forward, Slyfield Area Regeneration and Wisley Airfield have been identified as being unlikely to be in a position to meet the criteria of being either deliverable or developable.

Slyfield Area Regeneration Site Allocation A24

5.2 Slyfield is identified as a major development site with the capacity of accommodating 1,000 residential units as well as other infrastructure on a wider mixed use. This site is occupied by a number of existing uses including a waste transfer station and a large sewage treatment works operated by Thames Water. The treatment works currently process effluent from Guildford, Godalming, Cranleigh and surrounding villages and is clearly required for this function.

5.3 There is limited evidence that the replacement of the treatment works is supported by Thames Water and that this is desirable, deliverable or The sewage treatment works would require a significant cordon sanitaire in order to ensure that the residential amenity of future occupiers is protected. It is our experience that this is likely to sterilise much of the developable area of the site and would be required regardless of whether the works is relocated or remains in situ. Given the size and nature of the sewage treatment works a cordon sanitaire of c.300-400 metres around the treatment works is likely. The need for a significant cordon sanitaire around the sewage treatment works does not appear to have been acknowledged, nor has the need for support from Thames Water and Surrey County Council for the proposals.

5.4 It is noted that GBC envisages this site coming forward within the 11-15 year period. However, there is no evidence that there will be a reasonable prospect that this site will come forward for residential development or that the site is capable of accommodating the quantum of development envisaged given the need for a cordon sanitaire and the need to accommodate a number of competing uses identified for the site, including an 11 hectare site allocated for a waste facility in the Surrey Council Waste Plan, 2008. This allocation of 1000 units is a development commitment for a significant amount of the site. There is no evidence that the site is viable given that the proposed allocation includes a number of municipal facilities including: a new waste management depot, 11 hectares of waste facilities (an allocation in the Surrey Waste Plan, 2008), a new sewage treatment works and a primary school.

5.5 Indeed given that the site is only 40 hectares and over one quarter is allocated for waste facilities, in order to accommodate the proposed quantum of uses and the amount of residential development the resulting density would need to be in excess of 50 dwellings per hectare which would not be desirable in terms of the character of the area.

5.6 In the light of the considerable constraints that this site experiences it should not be relied upon to deliver the proposed 1,000 dwellings identified at allocation A24.

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

Attached documents:
Wisely Airfield Allocation Site A35

5.7 This proposed redevelopment site would provide 2,000 new homes as part of a larger mixed use development. There are, however, significant concerns that this site is unsuitable in planning terms, particularly regarding the strategic highway network.

5.8 The NPPF is clear that plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The site is manifestly not sustainable, it is not related to any existing settlement or infrastructure or local services. Indeed it is located in open countryside, remote from any settlement infrastructure. Development of this site would constitute a major housing development in a rural area which will rely upon car based travel to and from given the proposed access on to the A3 which is not conducive to encouraging modal shift to non-car based transport.

5.9 The inherently unsustainable location of this site means that its development as a major housing and employment site will conflict with the policies of the Framework. An Inspector will have to give very careful consideration as to whether it constitutes the most suitable location for the proposed form of development. The site is also the most contentious proposed allocation in GBC’s plan. Its suitability for major development will need to be very carefully scrutinised.

5.10 In the light of the potential deliverability issues displayed by some of the most significant strategic sites identified in the Plan, as well as GBC requiring yet further sites to meet its OAN of 693 dwellings per annum, there is no justification to not consider the land at Fairlands for development. The site is suitable, available and deliverable now.

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

Attached documents:

Comment ID: PSLPP16/10426  Respondent: 15503265 / Harriet Richardson  Agent:

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

6 GREENBELT

6.1 The key restriction regarding the development of the land at Fairlands site is its Green Belt. There are 5 purposes to the Green Belt which have been set out below in relation to this proposed allocation site.

To check the unrestricted sprawl of large built-up areas

6.2 The land to the west and south west of Fairlands adjoins the settlement of Fairlands, 2.6 miles north of Guildford. The western boundary of the site is constrained by the existing development of Littlefield Manor, including Littlefield Manor Riding School and the extent of the flat, developable area of land. The northern boundary is heavily wooded between the site and the Aldershot Road. The eastern boundary is formed of residential streets. The southern boundary is restricted by
an existing track and an established row of clustered mature trees. The site is therefore largely contained, and the less defined boundaries to the south and west could be strengthened through additional soft landscaping. It is therefore considered that this site is not required to be in the Green Belt in order to prevent the village from sprawling.

To prevent neighbouring towns merging into one another

6.3 The proposed extension to Fairlands would be to the west of the settlement. The nearest development to the west is a row of housing along Frog Row Lane. This is 1.2km from the existing western boundary of Fairlands and would still be 1km away should the site subject of this report be developed. The nearest village to the west is Willey Green which is 2km west of Fairlands. It is therefore considered that there is no risk of the proposed development of the site resulting in neighbouring settlements merging together.

To assist in safeguarding the countryside from encroachment

6.4 As set out in the two points above, the site is largely contained by existing development and mature woodland and vegetation. Development of the site would allow for a sustainable extension to an existing settlement.

To preserve the setting and special character of historic towns

6.5 Fairlands is not considered to have any special or historic character. The settlement was first built in the 1930’s with the majority of development taking place in 1960’s. The settlement is not considered to contribute to the setting of any nearby historic towns and therefore does not meet this purpose for land being within the Green Belt.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.6 The West Surrey SHMA found that the objectively assessed need was 1,729 homes per annum for the region between 2013 and 2033, 693 of which are to be provided within the Guildford local planning area per annum. It is therefore necessary for the Local Planning Authority to consider a range of sites, both brownfield and green. Of course brownfield sites should be developed first, however the Council has recognised that the existing available brownfield sites within the area are not sufficient to meet current housing requirements. There is therefore a clear indication that the Council will need to identify Greenfield land, much of which will be Green Belt if it is to meet housing requirements. In addition, Policy 2 of the Borough Wide Strategy clearly indicates that Green Belt land will need to be released for development in order to meet the OANs for the borough. On this basis there is a strong case for this identified site to be removed from the Green Belt to allow for beneficial development.

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

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3. POLICY 2: BOROUGH WIDE STRATEGY

3.1 The Borough Wide Strategy identifies Guildford Borough Council’s housing target as 13,860 during the plan period (2013-2033). The Objectively Assessed Need (OAN) is therefore 693 dwellings per annum. This figure was confirmed as part of the West Surrey Strategic Housing Market Assessment (SHMA) The SHMA also included Waverley and Woking within the Housing Market Area (HMA). Policy 2 stated that the delivery of homes is expected to increase over this plan period due to the time lag associated with delivering infrastructure. This phasing of delivery has been set out in the table below:

Table 1: Proposed phased housing delivery in GBC from 2018-2032

3.2 GBC demonstrated an under delivery of net completions of housing delivery between 2010 and 2015 and have continuously failed to meet their current OAN of 693 dwellings per annum as well as the former lower interim housing target of 322 dwellings per annum.

Supporting Text

3.3 Paragraph 18 and 4.19 of the supporting text for policy S2 in the Proposed Submission document state that countryside beyond the Green Belt will be required in order to meet housing requirements:

‘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. These include:

• countryside beyond the Green Belt
• urban extensions to Guildford and Ash and Tongham
• new settlement at the former Wisley airfield
• development around villages (including some expansion).

4.1.9 These will be phased according to deliverability and identified need. We anticipate that smaller allocated sites will provide the majority of supply in the first five years. 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.’

3.4 The land at Fairlands can be demonstrated as deliverable and could come forward in the earlier years of the plans in order to assist in addressing the continuous under delivery of development that has been seen over the past 5 plus years. It is therefore considered that this site should be re-introduced to the Local Plan and be allocated for housing development.

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

Attached documents: 2016-07-15 written reps to Proposed Submission Local Plan HR FINAL.pdf (453 KB)
1.1 Guildford Borough Council (GBC) is producing a new Local Plan to cover the plan period 2013 to 2033 and guide development within the borough whilst also complying with the principles and wider national policies identified within the National Planning Policy Framework (NPPF).

1.2 These representations are made as part of the Regulation 19 to the public consultation for the Proposed Submission Local Plan.

1.3 The representations relate to Land to the west and south west of Fairlands – ‘Land adjoining Fairlands, Guildford’ which was identified in the former Draft Local Plan Document as a ‘safeguarded’ site under Site Allocation 118. The site has not been taken forward as an allocation in the Proposed Submission Local Plan.

1.4 This statement provides a site summary and a review of Policy 2 of the borough wide strategy. It then addresses reasons why the land at Fairlands should be allocated for housing development in the Submission version of the Local Plan, covering issues such as housing requirements, the 5 purposes of the Green Belt and the questionable deliverability of large scale strategic sites that have been included in the Proposed Submission Local Plan.

**SITE SUMMARY**

2.1 The land to the west and south west of Fairlands has been identified on the map

2.2 The land adjoining Fairlands, Guildford’ was identified in the former Draft Local Plan Document as Site Allocation 118.

2.3 The site was also identified in Volume III of the Green Belt and Countryside study as providing opportunities to accommodate development without significantly compromising the purposes of the Green Belt. The parcels of land identified as H8-A H8-B (former allocation 118) have a capacity of circa 500 dwellings. The site is well related to existing services such as a local service centre, a doctor’s surgery and bus routes located within Fairlands, which is a residential area in character. The site provides the opportunity for a natural extension to the residential area of Fairlands on a contained site which is surrounded by defensible boundaries and tree cover.

2.4 This site is deliverable and available now. It is within a single ownership and as it was last in agricultural and equestrian use there are no constraints to the site coming forward for residential development. The site is achievable, it is capable of being delivered within five years and is entirely viable.

2.5 Fairlands uniquely is capable of accommodating an on-site SANG to mitigate the impact of any development upon the Thames Basin Heaths SPA. The developable area is shown edged red on Image 1 and the proposed SANG land is edged blue and hatched. We have discussed this with Natural England who have advised that this could be bespoke SANG land to support the development.

2.6 There is an existing access to Littlefield Manor and the land shown hatched brown on Image 1 will be used as a principle access road to the development land from the A323 Aldershot Road.

2.7 Fairlands is a sustainable settlement, with a number of services including a school, doctor’s surgery, post office, community centre and shops. Fairlands is located just 2 miles from Guildford, providing access to a range of quality services and infrastructure. It is therefore a wholly sustainable location for development.

**POLICY 2: BOROUGH WIDE STRATEGY**

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HOUSING LAND SUPPLY

Annual Monitoring Report

4.1 The recent Annual Monitoring Report (AMR) published in October 2015 to assess the period of 2014-2015 showed that net completions that year had been just 242. This is an under delivery of 80 dwellings against the interim housing figure and an under delivery of 451 units when assessed against the annual housing target for the plan period identified in the Proposed Submission Local Plan. The previous interim housing figure of 322 dwellings per annum agreed on May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. The phased delivery of housing proposed will further exacerbate this issue.

4.2 The AMR 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 demonstrates the need in the district for large scale strategic sites such as the land adjoining Fairlands. These representations therefore identify the key reasons why the site should be considered appropriate for housing and should be reinstated in the Local Plan for removal from the Green Belt. Paragraph 83 of the NPPF addresses removal of land from the Green Belt and states that boundaries ‘should only be altered in exceptional circumstance’. The current under delivery of housing is considered to be an exceptional circumstance and as a result Green Belt land such as the site at Fairlands should continue to be considered as an allocation site in the final Local Plan.

5 Year Housing Land Supply

4.3 The NPPF addresses the matter of housing land supplies in Paragraph 47 which stipulates 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%.’ It goes on to state that where there has been persistent under-delivery of housing in the district or borough, LPAs should increase the buffer to 20%. It is clear that GBC cannot currently demonstrate a 5 year housing land supply with in the region of only 1.4-2.5 years supply being currently identifiable. This will continue to be the case if GBC adopt the phased process identified in table 1 of this report.

4.4 The level of under delivery of housing is also likely to perpetuate as inward migration from the London Boroughs continues. Much of the SHMA is based on figures from 2012 which are now out of date and no longer accord with the population projections supplied by the Office of National Statistics (ONS) which show that by 2037, the population of Surrey is expected to increase by over 200,000.

4.5 It is therefore considered essential that previously identified deliverable sites, such as the land at Fairlands are included in the final Local Plan document as development allocations.

DELIBERABILITY OF STRATEGIC SITES

5.1 GBC anticipates that there are a number of sites within Guildford that can come forward within either 5 or 11–15 years. Whilst there may be a number of sites within the settlement that could be capable of coming forward, Slyfield Area Regeneration and Wisley Airfield have been identified as being unlikely to be in a position to meet the criteria of being either deliverable or developable.

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CONCLUSION

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

Attached documents: 2016-07-15 written reps to Proposed Submission Local Plan HR FINAL.pdf (462 KB) 2016-07-18 GBC re reps HR-CW.pdf (245 KB)
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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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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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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: PSLPS16/5180  Respondent: 15503361 / James Pasfield  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: PSLPS16/5181  Respondent: 15503361 / James Pasfield  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: PSLPS16/5184  Respondent: 15503361 / James Pasfield  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: PSLPP16/10409  Respondent: 15503361 / James Pasfield  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/10411  Respondent: 15503361 / James Pasfield  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: PSLPP16/10404  Respondent: 15503361 / James Pasfield  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: PSLPP16/10406  Respondent: 15503361 / James Pasfield  Agent:

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

Do you consider this section of the document; complies with 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: PSLPA16/2514  Respondent: 15503457 / Patrick Lea  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:

<table>
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<tr>
<th>Comment ID: PSLPS16/5189</th>
<th>Respondent: 15503457 / Patrick Lea</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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</table>

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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10403</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 due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

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

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

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

Attached documents:
Comment ID: PSLPP16/10408  Respondent: 15503457 / Patrick Lea  Agent:

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/10402  Respondent: 15503457 / Patrick Lea  Agent:

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/10405  Respondent: 15503457 / Patrick Lea  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
### 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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<thead>
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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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In addition I object to A43 change at Garlick's Arch because it ignores the many previous objections made by local residents and will generate significantly more traffic without the requisite infrastructure being put in place.

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

Attached documents:

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Furthermore I object to policy A58 at Burnt Common because it was deleted from the 2014 draft due to all the objections made at the time and there would seem to be no justification for building a new industrial/warehouse development when there are empty sites at Slyfield and Guildford.

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

Attached documents:

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Finally I object to the proposal to inset Send Business Park from the greenbelt because it is inappropriate and detracts from the local greenbelt.

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

Attached documents:

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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

Attached documents:
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:  PSLPS16/5205   Respondent:  15503585 / B Powell   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:  PSLPP16/10423  Respondent:  15503585 / B Powell   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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:  PSLPP16/10425  Respondent:  15503585 / B Powell   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: PSLPP16/10420  Respondent: 15503585 / B Powell  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: PSLPP16/10422  Respondent: 15503585 / B Powell  Agent:

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

Do you consider this section of the document; complies with 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: PSLPA16/2519  Respondent: 15503617 / Stephen Roy  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: PSLPS16/5211   Respondent: 15503617 / Stephen Roy   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 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: PSLPS16/5212   Respondent: 15503617 / Stephen Roy   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 Green Belt

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: PSLPS16/5216  Respondent: 15503617 / Stephen Roy  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: PSLPP16/10438  Respondent: 15503617 / Stephen Roy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/10439  Respondent: 15503617 / Stephen Roy  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: PSLPP16/10436  Respondent: 15503617 / Stephen Roy  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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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10437  Respondent: 15503617 / Stephen Roy  Agent:

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

Do you consider this section of the document; complies with 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?

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Comment ID: PSLPA16/2521  Respondent: 15503649 / N Ord  Agent:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

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

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Comment ID: PSLPS16/5217  Respondent: 15503649 / N Ord  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?

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Comment ID: PSLPS16/5218  Respondent: 15503649 / N Ord  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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Attached documents:

Comment ID: PSLPS16/5222  Respondent: 15503649 / N Ord  Agent:

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

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Attached documents:

Comment ID: PSLPP16/10450  Respondent: 15503649 / N Ord  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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Comment ID: PSLPP16/10448  Respondent: 15503649 / N Ord  Agent:

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

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Comment ID: PSLPP16/10449  Respondent: 15503649 / N Ord  Agent:

Document: Proposed Submission Local Plan: strategy 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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Comment ID: PSLPA16/2524  Respondent: 15503777 / Elya Koudou  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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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15503809 / M Pratt</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the 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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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO site A25 Gosden Hill Farm – this represents massive overdevelopment of 2000 homes in the Green Belt and will merge Clandon and Burpham creating urban sprawl</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I OBJECT TO the on and off ramps (site A43a) at Burnt Common – which will serve only to increase traffic problems in Ripley, Send, Burnt Common etc, as through traffic uses local roads as ‘rat runs’ in order to access the A3 and M25. Traffic is already gridlocked during busy times and existing roads are narrow, at times impassable and totally unsuitable for heavier traffic levels.

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

I OBJECT TO site A45 The Talbot – This is overdevelopment in a conservation area and should remain protected by the Green Belt

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 site A57 The Paddocks – 4 traveller pitches in Rose Lane

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 "in-setting" of any villages including Ripley. Send and Send Marsh/Burnt Common from the Green Belt. The Green Belt legislation was introduced to ensure clean air areas between around towns and cities following WW2 – currently Junction 10 of the M25/A3 has high levels of pollution and this will simply increase pollution levels across an extensive residential area.

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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<tr>
<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): ()

I OBJECT TO the 2016 revised Local Plan as the development proposed is not sustainable (Policy S1) – this is a seemingly ill thought through, last minute document, and not in line with your local government election manifesto: the inclusion of Garlick’s Arch is indicative of your disregard for those residents who elected you in response to now, your worthless promises. As a document, it cannot be thought of as a considered set of proposals following the rejection of plans put forward by your corrupt predecessors. You can do better using existing brown fields sites in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/10464</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 disproportionate amount of development in one area of the Borough. 36% of the proposed housing (5500 homes) is allocated along a short stretch of the A3 from Wisley to Burpham

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

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<th>Comment ID: PSLPA16/2529</th>
<th>Respondent: 15503937 / Justin Thorne</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 Horsleys Draft Local Plan and removal of Horsleys from the Green Belt

I object to the proposed development of the Horsleys for the following reasons;

- The road and rail infrastructure would not cope with an increase traffic. The local roads are already water logged and full of pot holes and are not developed enough for any more traffic. The access to the A3, should the Wisley proposal go ahead, would be impossible at peak times of the day.
- The infrastructure within the Horsleys is not capable of withstanding a huge increase to it’s current population. Namely, the doctor’s surgery and car parks within the village would be over subscribed. Although, my family does not use the local school, I would imagine this to be full to capacity too.
- There is no reason to remove the Horsleys from Green Belt status. No exceptional circumstances have been given and as such, the Horsleys should remain Green Belt.
- The proposed percentage increase to such a small village, appears excessive and alarming and would affect the core of the village life itself. I have lived in the village for almost seven years and my above concerns are because of the personal and local knowledge, built up over this time.
I hope you take my concerns into consideration.

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

Attached documents:

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Comment ID: PSLPA16/3923  Respondent: 15503969 / Katy Denham  Agent:

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

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

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

I object to the 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: PSLPA16/3924  Respondent: 15503969 / Katy Denham  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 is fundamental that there are no grounds for East and West Horsley to be taken out of the Green Belt. I object to the extension of the settlement boundaries by the redrawn insetting boundary. These can only be to try and make more land available for what has been shown to be inappropriate development and included in an enormous document so that they will probably be missed by residents. I particularly object to the inclusion of Kingston Meadows, land owned by GBC and previously dedicated as open space for the use and benefit of the community. No change to the settlement boundary has been justified. I object to the inclusion in the Plan of six large housing sites in the two villages (A36 - 41). They should be removed from the Plan as they are contrary to the Green Belt and to include them preempts proper decision making.

In addition I draw your attention to the very serious existing problems in the village with infrastructure - roads, flooding and drainage, sewage, etc - and facilities - schools, doctors, failing businesses, no useful buses, to mention just a few. For
these reasons a large increase in housing is not feasible. It would also destroy the character of the village. For all the reasons given above, I am against any additions to housing in East and West Horsley.

I object to the revised Settlement Hierarchy with another meaningless tick box exercise. East Horsley is not a rural district centre within any ordinary meaning of the phrase. People do not come from outlying area to East Horsley for shopping or work, they go to Guildford, Dorking, Leatherhead or other urban areas, including Surbiton, Kingston and London. East Horsley is not suitable for town centre type developments and I object to these policies (E8).

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

Attached documents:

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New Settlement at Ockham

I strongly object to the proposal to use farm and previously requisitioned land at Ockham for 2,100 houses. The impact on my village would be enormous and unsustainable. Planning permission has recently been refused for numerous reasons and the site should therefore be removed from the Plan.

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

Attached documents:

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Green Belt (including Policies S1, S2, P2)

I strongly object to the proposed changes to the Green Belt Boundary to inset my village and about 13 other villages from the Green Belt. All the villages should remain in the Green Belt. If someone hadn't had the vision to create the Green Belts before I was born, I am sure my village and the countryside around it would just be urban sprawl by now. It would not be here for the thousands who come out from London every week to cycle or walk or simply be in the countryside. It would not be here to act as green lungs for the whole of England, to contribute towards easing the climate problems we are creating, to help to maintain biodiversity. I have been lucky enough to grow up here, so I see how important it is for others.
I also know the Walton, Weybridge, Byfleet area and Staines, Egham, so I can see what happens when anything happens to allow higher density development in - urban sprawl. This is too important to risk. The Green Belts are not ours or yours to give away, but a precious gift to be preserved for my children and their children.

89% of Guildford Borough is in the Metropolitan Green Belt. The Local Plan should have the protection of the Green Belt at its heart. The Green Belt was always intended to be permanent and its boundaries cannot be changed except in exceptional circumstances. You have shown no exceptional circumstances under the NPPF for the Green Belt boundary to be changed.

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

Attached documents:

Comment ID: PSLPP16/10492  Respondent: 15503969 / Katy Denham  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

Village sites - East and West Horsley

It is fundamental that there are no exceptional circumstances for East and West Horsley to be taken out of the Green Belt. Any additional housing should therefore be small scale. I object to the extension of the settlement boundaries by the redrawn inletting boundary. This can only be to try and make more land available for what has been shown to be inappropriate development and included in an enormous document so that they will probably be missed by residents. I particularly object to the inclusion of Kingston Meadows, land owned by GBC and previously dedicated as open space for the use and benefit of the community. That is a key green space and recreational area where I have used the play parks, bike humps, trim trail and football pitch for decades with friends from the village and outside. It is used by hundreds of dog walkers and for village celebrations. No change to the settlement boundary has been justified. I object to the inclusion in the Plan of six large housing sites in the Green Belt outside the two villages (A36 - 41). They should be removed from the Plan as they are contrary to the Green Belt and to include them preempts proper decision making. I object to a Plan which allocates Housing disproportionately to the Green Belt villages and in particular the Ockham, Send, Horsleys area. This is morally and legally wrong and contradicts your Vision. A proper assessment of urban brownfield sites should provide enough sites for housing to be allocated at least proportionately as between the urban area and villages.

In addition I draw your attention to the very serious existing problems in the village with infrastructure - roads, flooding and drainage, sewage, etc - and facilities - schools, doctors, failing businesses, no useful buses, to mention just a few. There is a high dependence on car use. We walked to school for years but were part of a very small number because people said they were to frightened of the narrow roads and traffic! There is flooding along the roads almost every time it rains. For these reasons a large increase in housing is not feasible. It would also destroy the character of the village and of the Green Belt which surrounds it. For all the reasons given above, I am against anything other than small scale additions to housing in East and West Horsley.

I object to the revised Settlement Hierarchy with another meaningless tick box exercise. East Horsley is not a rural district centre within any ordinary meaning of the phrase. People do not come from outlying areas to East Horsley for shopping or work, they go to Guildford, Dorking, Leatherhead or other urban areas, including Surbiton, Kingston and London. East Horsley is not suitable for town centre type developments and I object to this policy (E8).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/16323  Respondent: 15503969 / Katy Denham  Agent:

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

Do you consider this section of 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 the proposed changes to the Green Belt Boundary to inset the named villages from the Green Belt (including Policies S1, S2, P2). All the villages should remain in the Green Belt.

89% of Guildford Borough is in the Metropolitan Green Belt. The Local Plan should have the protection of the Green Belt as its cornerstone. The Green Belt was always intended to be permanent and its boundaries cannot be changed except in exceptional circumstances. You have shown no grounds for the Green Belt boundary to be changed.

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

Attached documents:

Comment ID: PSLPP16/10490  Respondent: 15503969 / Katy Denham  Agent:

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

Do you consider this section of 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

I object to all policies based on your housing figures, which I believe are too high even before the Brexit vote which should take them down further. Also my councillor tells me that the calculation of those figures has not been explained even to him! How can that be right? Housing policy should be based on real and understandable housing NEED for borough residents, restricted necessarily by the requirement to preserve the Green Belt boundary. I further object to a Plan which requires 70% of housing to be built on the Green Belt.

Brownfield land - empty shops, unused railway land, - is available in the town centre. I expected you to really work hard to develop policies which require the use of urban brownfield sites first and to seek out those sites, which I believe can cope with real housing and commercial need and I object to your policies which do not do this (Policies H1,H2). The need for
shopping and commercial space is declining with current retail trends and Guildford town centre should be revitalised with more town centre housing than is proposed. (Objection to policy E7).

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

Attached documents:

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Comment ID: PSLPP16/16324  Respondent: 15503969 / Katy Denham  Agent:

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

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

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

Your proposed housing numbers of 13,860 are too high. The figures seem to be subject to serious doubt, as will be detailed by groups representing the interests of borough residents such as the East Horsley Action Group, which I support and others. I therefore object to all policies based on your housing figures until such figures are no longer in doubt.

Brownfield land is available in the town centre. I would direct you to the open letter and brownfield site assessment sent to GBC councillors by Guildford Green Belt Group. I call on you to develop policies which require the use of urban brownfield sites first, which I believe can cope with real housing and commercial need and I object to your policies in this matter. Guildford town centre is the only place in the region with any requirement for redevelopment, but that should be undertaken within existing buildings, where retail developments are no longer viable.

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

Attached documents:

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Comment ID: PSLPA16/2539  Respondent: 15504001 / Margaret Banks  Agent:

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

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

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

APPENDIX C
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2542  Respondent: 15504001 / Margaret Banks  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: PSLPA16/2536  Respondent: 15504001 / Margaret Banks  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.

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:**

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<th>Comment ID:</th>
<th>PSLPS16/5251</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 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:** PSLPP16/10565  **Respondent:** 15504001 / Margaret Banks  **Agent:**

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

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

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

I OBJECT to Policy D3 - Historic environment

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

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

**Attached documents:**

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**Comment ID:** PSLPP16/10570  **Respondent:** 15504001 / Margaret Banks  **Agent:**

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

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

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

**POLICY D4**

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

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

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

Attached documents:

Comment ID: PSLPP16/10516  Respondent: 15504001 / Margaret Banks  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: PSLPP16/10519  Respondent: 15504001 / Margaret Banks  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: PSLPP16/10522  Respondent: 15504001 / Margaret Banks  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: PSLPP16/10577  Respondent: 15504001 / Margaret Banks  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.

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

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

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/10546  Respondent: 15504001 / Margaret Banks  Agent:

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

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

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

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

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

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

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

**Attached documents:**

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**Comment ID:** PSLPP16/10550  **Respondent:** 15504001 / Margaret Banks  **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: PSLPP16/10573  Respondent: 15504001 / Margaret Banks  Agent:

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

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

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

POLICY H3

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

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

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

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

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

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

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

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

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

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

Attached documents:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/10540  Respondent: 15504001 / Margaret Banks  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: PSLPP16/10543  Respondent: 15504001 / Margaret Banks  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: PSLPP16/10509  Respondent: 15504001 / Margaret Banks  Agent:

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

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

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

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

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

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

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

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

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

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

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/10513   Respondent: 15504001 / Margaret Banks   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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<th>Comment ID: PSLPP16/10501</th>
<th>Respondent: 15504001 / Margaret Banks</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</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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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: PSLPP16/10504  Respondent: 15504001 / Margaret Banks  Agent:

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

Do you consider this section of the document; complies with 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 (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 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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<thead>
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<th>Comment ID:</th>
<th>SQLP16/1327</th>
<th>Respondent:</th>
<th>15504001 / Margaret Banks</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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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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<td>I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.</td>
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<td>The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:</td>
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<td>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.</td>
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<td>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.</td>
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<td>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.</td>
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<td>The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.</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: SQLP16/1330  Respondent: 15504001 / Margaret Banks  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: SQLP16/1333  Respondent: 15504001 / Margaret Banks  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:

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<th>Respondent: 15504001 / Margaret Banks</th>
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<tr>
<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.

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: PSLP16/10534</th>
<th>Respondent: 15504065 / Sandra Moreton</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I wish to object to the proposal to remove Green Belt protection from Chilworth village and those surrounding it.

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

Attached documents:

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Comment ID: PSLPS16/5242  Respondent: 15504097 / Michael Taylor  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 your draft Local Plan of June 2016 relating 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 and there is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

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. In addition, Hatchford, south of the M25, has some 60 residences off the narrow Ockham Lane that would be greatly affected by the proximity of development.

I strongly 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 occupants at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions. Also, owing 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.
Also, insufficient 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.

My 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:

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Comment ID: PSLPS16/5243  Respondent: 15504129 / Simon Hurdle  Agent:  

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

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

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

Policy A43 - Garlick’s Arch

I object -

1) This is land is Green Belt - designed to prevent sprawl and the merging of settlements. No ‘exceptional circumstances’ have been claimed – indeed there has been little time to address this or the other issues below. This site was not in the 2014 Section 18 original draft Local Plan, not the revised Section 19 Local Plan in April 2016, and appeared just thirteen days before the Council met to recommend consultation – a poor way to make large decisions.

2) The development is too large – the proposal for 400 homes plus light industrial facilities represent an increase of about a quarter the size of Send village. People living there will use the Send schools and the Send-based Villages Medical Centre which serves Send and Ripley. These are currently working at capacity. 400 homes at Garlick’s Arch would provide too many patients and pupils for present arrangements, and not enough to make feasible the building of a new school or new medical facilities.

3) The proposed new links to the A3 would mean a large increase in traffic through Send and at the Burnt Common Roundabout; these road are already jammed at times. It is claimed that it is not permitted to link the Garlick’s Arch directly to the A3, so traffic to and from the site would use the narrow Burnt Common Lane, the Portsmouth Road, Burnt Common Roundabout and the A247 Clandon Road before accessing the new links, hugely adding to local traffic. Even if the direct link to the A3 could be made, some vehicles from Garlick’s Arch traffic would be bound to use the A247 through Send to Woking, going through Burnt Common Roundabout.

The A247 and Burnt Common Roundabout are already gridlocked at busy times; any further traffic would cause significant delays for longer periods, and consequently higher levels of traffic pollution ( diesel particulates, carbon monoxide and oxides of nitrogen ).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5244  Respondent: 15504129 / Simon Hurdle  Agent:

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

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

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

Policy A44 – Land West of Winds Ridge, Send Hill

I object – Land in Green Belt; resulting traffic using Send Hill which has single track road in one direction and the busiest junction in the village in the other, adding further pressure to traffic. There are concerns over the safety of landfill waste in the ground.

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

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Comment ID: PSLPP16/10588  Respondent: 15504129 / Simon Hurdle  Agent:

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

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

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

Policy P2 - Green Belt

I object – to the proposed insetting of villages from the Green Belt, and the green light given to infilling. This means to villages are open to development as well as the allocated sites. Green Belt protection is national policy – its protection was strongly promoted by national political leaders in the 2015 General Election and by most candidates, including those of the majority party in Guildford, in the 2015 Local Elections. Appeal case law has shown that even if housing need does exist, that does not automatically over-ride the protection accorded by the Green Belt legislation.

Guildford B.C. claims that less than 2% of Green Belt will be lost, but factoring in the insetting of villages the figure appears to be nearer 6%.

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 S1 - Presumption in favour of sustainable development**

**I object** – The policy fails to accept the current infrastructure deficit, principally though not exclusively concerning roads. The plan does not appear to have to have had the permitted ‘Constraints’ applied; in this area Green Belt and already gridlocked road could and should have been used to constrain the target for building homes.

The Council claims that all development is predicated on the delivery of new infrastructure. New links may well improve roads such as the A3 itself, but there is no conceivable improvement which could be made to any road joining the A3, when the entire purpose is to attract more traffic at these points. It is pointless to rely on an infrastructure which it is physically impossible to deliver, regardless of the level of funding.

**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 - Borough wide strategy**

**I object** – The calculation that 13,860 homes are required is based on a calculation made by a sub-contractor who will not share the basis of the calculation, citing commercial confidentiality. Wrong in principle – government should be open and transparent; important data should be open to give public confidence that it is accurate, based on sound assumptions, and free of commercial bias.

In 2014, the House of Commons and Local Gov. C’tee was critical of the accuracy of SHMA processes; it noted cases where two independent calculations yielded different results. Their report concluded (Section 69), “Communities need to
have confidence that the figures on which their local plans are based are accurate. There can be little reassurance about the SHMAs when two assessments of the same area, ....... produce very different results.”

The method of calculating the population of a town with many foreign students also distorts the population total. The Employment Land Needs Assessment 2015 indicates that Guildford does not need a large increase in employment space, which suggests that such housing as is needed could largely be built on Brownfield sites.

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

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OBJECTION TO PROPOSED RESIDENTIAL DEVELOPMENT IN WEST HORSLEY

The proposals currently being considered for increasing the density of housing in this area must take account of the B2039 (Ockham Road North/Ockham Road South) which is the only road linking the A3 through to the A246 Guildford road. This road is incapable of supporting the amount of traffic the proposed new housing would generate. I would imagine the cost of building or widening a connecting road would make the development proposals financially unfeasible.

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

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<th>Comment ID: PSLPA16/2567</th>
<th>Respondent: 15504577 / Indigo Planning Limited (Michael Wood)</th>
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2. Proposed Housing Strategy

- This section considers the requirement for a Local Planning Authority to identify, plan for and deliver a supply of new homes to meet an identified Housing Need.

Housing Need

- The need to identify a deliverable supply of new housing land is set out within the Government’s National Planning Policy Framework (NPPF), and National Planning Practice Guidance (PPG).

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 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

Requirements of the PPG

- The Planning Practice Guidance to accompany the NPPF was first published in March 2014 and is kept up-to-date on an on-going 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, e.g. 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 needs.

- Paragraph 016 states that wherever possible, local needs assessment should be informed by the latest available data. 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 undersupply relative to demand”. Relevant indicators include house prices, rents, affordability and

Compliance with NPPF and PPG

• 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 This is made up of an anticipated requirement of 517 dwellings, 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 This updated figure, therefore, represents an increase of 820 homes over the plan period, compared 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

• The PPG 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). 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

• This is unsound, given that, since the publication of the mid-2012 population projections in 2013, mid-year population projections have been published for mid-2015, mid-2014 and mid- As a minimum, the mid-2014 projections should have been used 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.

• We consider that, on the basis of the above, the SHMA should be revised to take into account the latest 2014 mid-year projections in order to meet the requirements of the NPPF and The 2014-based projections show an increase of 39 households per annum over the 2012-based projects. Applying this increase logically to the overall OAN, the Council has a need to for 732 dwellings per annum and an overall plan target of 14,640.

Duty to Co-operate and the wider Housing Market Area (HMA)
• The 2015 SHMA identifies that Guildford shares a HMA with Woking Borough Council and Waverley Borough Council. Both authorities are also in the plan-making process and it has not been determined whether either Council will be able to meet their own OAN requirements as set out in the SHMA.

• The Plan should build the contingency of an early review if the plans of the neighbouring authorities are delayed or if they are unable to meet their In this scenario, there may be a requirement for GBC to provide for the unmet need of its neighbours in line with Paragraph 182 of the NPPF.

Five year supply

• In accordance with Paragraph 47 of the NPPF, the Council is required to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing need.

• Housing need within the Borough was most recently assessed as part of the West Surrey Strategic Housing Market Assessment (SHMA), published in October. The report considers the need for housing within the West Surrey Housing Market Area, which includes Guildford, Waverley and Woking Boroughs. Overall, the SHMA identifies an Objectively Assessed Need (OAN) of 693 dwellings within the Borough of Guildford per annum.

• The council currently monitors this supply through its Annual Monitoring Report (AMR). The most recent version of the AMR, published in October 2015, concludes that there is a 4 year supply against the OAN of 693 homes per year. The council is, therefore, unable to demonstrate a five year supply of housing land.

• The Proposed Submission Local Plan: Sites and Strategy continues to base its housing trajectory on this. To take account of rising population levels, and to build greater flexibility into the plan, Policy S2 sets out a target of between 700-800 additional dwellings per annum.

Identified supply of housing

• In order to meet the requirements of Policy S2, the emerging Local Plan allocates a number of sites considered to be suitable for residential. These allocations provide land for approximately 10,778 new homes over the plan period across 34 identified sites. The remaining housing provision is made up of windfall sites, broad locations (such as Ash and Tongham) and commitments.

Deliverability

• The site allocations set out within the emerging Local Plan identify a number of large sites capable of accommodating over 1,000 new homes. Some of these larger sites are reliant on some significant infrastructure works which will need to be provided for before housing could be delivered, these include:

• (A24) Slyfield Area Regeneration Project, Guildford;

Allocated for 1,000 new homes. Policy A24 states that delivery and timing will be dependent on the key infrastructure requirements as set out in the Infrastructure Delivery Plan.

• (A25) Gosden Hill Farm, Merrow Lane, Guildford;

Allocated for 2,000 new homes. Implementation is reliant upon highway works to relocate the southbound on-slip of the A3, and a new roundabout to provide a link to the A3100.

• (A26) Blackwell Farm, Hogs Back, Guildford;
Allocated for 1,800 new homes. Implementation reliant upon the realignment of a junction on the A31 and the Down Place road, which will need to be signalised. Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue. A through vehicular link is required via this access between Farnham Road (A31) and Egerton Road to provide a new route to Surrey Research Park. Other highways impacts may need to be mitigated against.

- (A35) Land at Former Wisely Airfield, Ockham;

Allocated for 2,000 new homes. Interventions will be required which address the possible highway performance issues including a number of mitigation schemes to address issues, particularly on the A3/M25 junction Wisley interchange.

Summary

- Overall, the plan has been positively prepared in an attempt to fully meet the Council’s identified Objectively Assessed
- Unfortunately, the evidence base behind the OAN is out of date and will need to be updated ahead of the submission of the Plan to the Secretary of This is likely to result in an uplift to the overall housing target which reinforces the need for the Flexford/Normandy strategic allocation. This allocation would also have the capacity to provide additional residential accommodation if the Council is required to find more housing land to meet an increased target.
- Whilst we do not contest the deliverability or soundness of any of the proposed allocations within the Plan, we do note that many of the larger allocation are reliant upon the delivery of significant highway infrastructure before any dwellings will be This further supports the allocation of the Normandy/Flexford site which has relatively few constraints to the deliverability of much needed housing and social infrastructure.
- The merits of the Normandy/Flexford site are discussed in more detail within the following

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>15504577 / Indigo Planning Limited (Michael Wood)</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Submitted on behalf of Kitewood Estates Ltd

2. Land to the south of Normandy and north of Flexford (Policy A46)

- This section of the report assesses the Allocation of the south of Normandy and north of Flexford
• Policy A46 allocates land to the south of Normandy and north of Flexford for a residential led mixed use development, to include:

• Approximately 1,100 homes (C3), including some specialist housing and self-build plots (C3);
• A nursing or residential care home (C2) with approximately 60 beds;
• 6 Travelling Showpeople plots (sui generis);
• Approximately 400 sqm of comparison retail floorspace (A1);
• Approximately 300 sqm of convenience retail floorspace (A1);
• Approximately 400 sqm of services (A2-A5);
• Approximately 300 sqm of community facilities (D1);
• A secondary school (D1) (up to eight form entry); and
• A village green

• The development will provide a sustainable and inclusive community which will also enhance the accessibility to services of existing residents in Flexford and

Principle of the allocation

Sustainability

• We support the allocation of Policy A46 Land to the south of Normandy and north of The development will deliver a truly sustainable development to meet the three arms of Paragraph 7 of the NPPF.

• With regards social and economic elements of sustainability, the Council, in identifying an OAN for housing has sought to plan positively for social and economic In light of the analysis in Section 2, this allocation is crucial to the Council’s housing strategy over the plan period. The associated benefits of the scheme which will include a substantial amount of housing (bringing with it significant economic benefits) a much needed secondary school, village green, a local centre, Travelling Showpeople pitches and a nursing home will serve the existing community as well as future residents.

• With regards the environmental element of sustainability, this has been duly considered by the Council in preparing the draft All ecological considerations have been taken into account and wider Green Belt and landscape considerations and set out below.

• We agree that this opportunity, along with the relative sustainability of the site in close proximity to Wanborough Train Station, provides exceptional circumstance to support this allocation, in accordance with paragraph 83 of the

• A key strength of the site is its proximity to Wanborough railway station and accessibility to the local ‘A’ road. The site scores well from a sustainability perspective (identified within Table C of the Sustainability Appraisal (SA)) and where the site currently lacks sustainability credentials (for example access to recreation, retail and education facilities), these are to be provided for within the proposed allocation.
Green Belt and Garden settlement

- We do, however, contest the Council’s findings with regards the value of the site in relation to the purposes of the Green The SA states at paragraph 10.11.3:

“With regards to Green Belt, the point to note is that greater weight is now being applied to sensitivity than was the case in 2014, and it is only because Normandy/Flexford presents an exceptional circumstance that allocation is proposed here on a red-rated site.”

- We are of the opinion that the site has relatively limited Green Belt With regards the NPPF purposes of the Green Belt:

  - Purpose 1 (to check the unrestricted sprawl of large built-up areas) – Neither Normandy nor Flexford could be regarded as large built-up The site’s comprehensive development will, effectively, create a new settlement which will, in itself, be sustainable. In this context, development of the site would not, in any way, cause urban sprawl.

  - Purpose 2 (to prevent neighbouring towns from merging into one another) The proposed development will create a new well-planned

  - Purpose 3 (to assist in safeguarding the countryside from encroachment) – Development of the site will, inevitably, result in increased built-form in the However, the scheme will provide substantial improvements to the accessibility of the site to help improve accessibility to outdoor recreation and ultimately, will not undermine the integrity of the countryside.

  - Purpose 4 (to preserve the setting and special character of historic towns) – we agree that the site does not preserve the setting of a historic town

- The exceptional circumstances for the allocation of the Flexford/Normandy site to deliver much needed housing and social infrastructure justify the site’s

- Paragraph 52 of the NPPF promotes the supply of new homes through planning for larger scale developments such as new settlements or extensions to existing villages that follow the principles of Garden The Normandy/ Flexford development allocation clearly seeks to accord with paragraph 52 of the NPPF.

- The development will provide an integrated settlement with an accessible, centrally located local centre with retail space, community facilities, a school and outdoor recreation, including a village The settlement will provide high quality housing to meet local needs (in line with the other proposed policies of the Plan) that will integrate into its rural surroundings.

The school

- We support the identification of the site for a secondary The evidence base provided by GBC and Surrey County Council (SCC) clearly demonstrates the need for new secondary school capacity to support a likely additional pupil yield from new developments of 2,962.

- The site has the capacity and accessibility to deliver a well located and much needed secondary The school will serve the Blackwell Farm strategic allocation as well as the Normandy/Flexford development.

- We also support the wording of Policy A46 to direct the new school close to Wanborough
railway station to encourage sustainable travel and facilitate a catchment which could include pupils from Ash and Guildford Town.

Quantum and transport

- We note that the Sustainability Appraisal (SA) at Table 2 identifies that the allocation for 1,100 homes will remain constant throughout the housing growth options (OAN to OAN, plus 34% buffer).
- The policy text states that interventions will be required which address the potential highway issues which could otherwise result from the Guildford Borough Transport Strategy 2016 identifies aspirations to improve the A323 Guildford Road at various These are primarily relatively small scale improvements relating to traffic management and the environment. The exception to this is the proposed new road bridge and footbridge scheme to enable a level crossing closure on A323 Guildford Road adjacent to Ash railway station (Policy reference A30).
- It is currently unclear how much funding for the new bridge will come from planning It is imperative that the Normandy and Flexford scheme is not required to provide unjustified and excessive levels of contributions towards this scheme. The majority of planning obligation funding for this infrastructure project should be sought from the strategic growth of Ash and Tongham which is more directly related to the proposed bridge.
- The site has good access to the local rail network and we anticipate that a significant proportion of vehicle traffic will be directed east towards Guildford and the As such, only a limited proportion of vehicle movements are expected to use the Ash and Tongham proposed bridge (for access to the A331 and M3). Any financial contribution from the development of the site must be fairly and reasonably related in scale and kind to the development in order to comply with the CIL Regulations.

Design and layout requirements

- Policy A46 states that sensitive design at site boundaries will be required in order to have regard to the transition from village to We support the wording of the policy with regards the design requirements as it is not overly restrictive which will allow an appropriate layout to be prepared during design development.

Thames Basin Heath SPA

- The site is within the 5km buffer zone to the Thames Basin Heath Any impact on the SPA by the development will be mitigated in compliance with the relevant policy and legislative requirements.

Deliverability

- There are no barriers to the deliverability of the site which would prevent or delay housing coming forward within the short The infrastructure and design requirements associated with the development are relatively minor compared with other strategic sites within the Plan and will not delay the deliverability of the much needed housing.
- If allocated, we would expect the site to begin delivering houses within a five year The housing trajectory provided at Table 1 suggests that the site will not deliver housing until 2021/2022, we believe that the site can deliver housing sooner than this and would recommend this be updated to 2020/21.
Summary

- As noted in the previous section, the allocation of the strategic site at Normandy/Flexford is crucial for the Council to be able to implement its strategy. The site will provide much needed infrastructure that will serve the wider needs of the existing population, other key strategic development sites, as well as the future residents of the site itself.

- It has been identified that the site is sustainable and will enhance the sustainability of the surrounding area (Normandy and Flexford) through the delivery of new infrastructure and

- We agree that exceptional circumstances are required to release land from the Green Belt and the infrastructure provision of the site (alongside general housing need) provides this exceptional However, we contest that the findings of the GBCS do not accurately reflect the true value of the site in Green Belt terms when compared with analysis of other sites in the Borough.

- The development will create what is effectively a new self-contained This approach accords with Paragraph 52 of the NPPF to increase the supply of new homes through large village expansions or new settlements by applying the principles of Garden Cities.

- There are relatively few barriers to the delivery of the scheme and, as part landowner, our client would be in a position to begin delivering housing on the site within a five year

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

Attached documents:

Comment ID: PSLPP16/10627  Respondent: 15504577 / Indigo Planning Limited (Michael Wood)  Agent:

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

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

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

Policy H2: Affordable housing

- The PPG at Paragraph 020 states that planning obligations should not be implemented where they would make a development proposal It is emphasised that this is particularly relevant for affordable housing contributions. Without reference to viability and affordable housing, Policy H2 is currently in conflict with this element of the PPG. We suggest the following sentence be added to the policy text:

“Proposals departing from these requirements will be expected to justify any lower provision through the submission of a financial viability appraisal”. 
• Whilst we appreciate that this provision is set out within the supporting text to the policy, in order to be implemented as part of the policy it must form part of the policy text.

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: PSLPP16/10628</th>
<th>Respondent: 15504577 / Indigo Planning Limited (Michael Wood)</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): ()

Submitted on behalf of Kitewood Estates Ltd

PolicyI1: Infrastructure and delivery

• As noted above, Policy I1 should take account of the PPG in acknowledging that planning obligations should not result in a development proposal becoming unviable.

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: PSLPP16/10626</th>
<th>Respondent: 15504577 / Indigo Planning Limited (Michael Wood)</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): ()

Submitted on behalf of Kitewood Estates Ltd

PolicyS2: Borough Wide Strategy

• As noted above, we are generally supportive of the council’s approach to housing delivery, though believe the target will need to increase in order to meet up-to-date.
• To accord with Paragraph 182 of the NPPF, and for the Plan to truly be positively prepared, Policy S2 should be re-worded so it makes provision for “at least” the identified A caveat should then be included to begin an early review of the Plan if housing requirements change, for example if neighbouring authorities are unable to meet their own housing needs.

• We also object to the proposed phasing of the annual housing target as set out in Policy. The phasing of the housing targets will result in the Council failing to meet its housing requirements until 2022.

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

Attached documents:

Comment ID: PSLPP16/10625  Respondent: 15504609 / Ian Little  Agent:

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

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

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

In addition I object to the proposed major development sites across the Horsleys and at Okham. This objection is based on the fact that the local infrastructure is already overloaded and any further major developments in this area would seriously affect the safety and quality of life of the current residents. The local schools are full, medical services stretched and in particular from a safety and environment point of view the local roads are totally inadequate for any potential increased traffic. The quantity and speed of traffic through Forrest Road and Ockham Road are currently a major issue.

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

Attached documents:

Comment ID: PSLPP16/10624  Respondent: 15504609 / Ian Little  Agent:

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

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

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

I am writing to you to object to the removal of the Horsleys from the green belt. I do not agree that the exceptional circumstances required to do this have been met or demonstrated.

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: PSLPP16/10629</th>
<th>Respondent: 15504641 / Stanley Jackson</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I write as a resident of West Horsley in support of retaining the Horsleys status as part of the green belt which continues to serve its original purpose of providing a useful escape from urban encroachment – a much appreciated open space to counter over development.

However this should not be taken as endorsement for the overly negative approach taken by most local planners who seem obsessed with maintaining the status quo irrespective of the needs of a thriving and growing community. Sensible plans which add to the housing stock and which are consistent and commensurate with existing structures would be welcome. Too often the planners say no when they might easily loosen some planning guidelines which do not involve building brand new properties on pristine green belt land.

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: PSLPA16/2568</th>
<th>Respondent: 15504673 / Nicole Richmond</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth</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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Object: Keep Chilworth In the Green Belt. Schools and doctors are full, roads already too busy, we are not equipped for more homes! Keep our beautiful countryside for the next generations.

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: PSLPA16/2569</th>
<th>Respondent: 15504737 / Alison Davies</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Once again we are required to say NO to large developments that will totally change the character of this area no longer making it a village but part of an urban sprawl. I moved from a city because my family and I wanted to live in a village and all that entails. Large green spaces for children to enjoy and their children. Not vast housing estates taking away the character of village life. All the problems of urban living overcrowding of roads/ country lanes. Over stretched local services, schools and health services. We have to protect our Green Belt not only for future generations but also for the animal population. I do not understand how by the stroke of a pen and the lure of developers money that Green Belt status can be rescinded. It makes me question if certain people in authority in the council and above have vested interest in the proposed development. If we can not protect the Green Belt future generations will never have any understanding of what green fields and space is like they will just be used to vast urban areas. It is out duty to fight for the right to protect our Green Belt. I understand the need for housing there are plenty of brown filled sites around Guildford that are better placed for road access and amenities. We will not give up and will campaign and fight the council at every opportunity. Say NO to the local plan.

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

Attached documents:

Comment ID:  PSLPP16/10665  Respondent: 15504801 / M A Lawrence  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

There is only ONE state primary school in West Horsley and NO state secondary schools. The Raleigh School is already oversubscribed and many children living in West Horsley were NOT offered places at their local school in the last few years. There is already a problem here with a lack of places and this already needs resolving WITHOUT adding another 533 homes. How do you propose to deal with this??

Medical services

It is already difficult to get an appointment at Kingston Avenue Medical Centre, the ONLY surgery in East and West Horsley. You cannot dilute this service any more.

Drainage and Flooding

There are known sewage overflow problems in Ockham Road North and Green Lane. There will be serious capacity issues with the sewer network in the village going right through to the treatment works if the large numbers of dwellings proposed are constructed.

The amount of flooding experienced a couple of years ago meant many main roads were closed for weeks on end. We were forced to use small lanes to exit the village. By doubling the number of cars in the village, this issue will be exacerbated.

I am disappointed that, despite the many objections to your plans, you STILL continue to ignore the overwhelming feedback from local residents. It is us, the current residents, who will have to live alongside these new developments.
and put up with the vast increase in local traffic and demand for public transport, schools, medical facilities and parking, etc.

Your plans will have a **HUGELY negative impact on our day-to-day lives.**

I trust that you will finally listen and review your plans substantially.

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

Attached documents:

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**Traffic**

The increase in traffic on East Lane, in particular, will be intolerable with the proposal of over 345 new households impacting on this road (potentially up to 750 more cars?). It is already congested during school times from Nightingale Avenue and Northcote Road. This will have a massive impact on our day-to-day lives.

2000 houses are being planned for Wisley Airfield. Many of these potential residents will be driving in and out of Horsley to use the station and shops. **We simply DO NOT have the capacity for additional parking at Horsley Station and local shops. The Station car park is currently full every weekday as it is. It will become impossible to use the train as there is no alternative parking.**

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

Attached documents:
I refer to the proposed planning in West Horsley, the extent of which is entirely unacceptable.

The latest plan indicates over 530 new homes for The Horsleys. This level of new housing would COMPLETELY change the character of the village, not to mention the impact it will have on its infrastructure.

Green Belt

You seem determined not to respect the green belt. How can you possibly consider removing these villages from the green belt??

We moved to West Horsley nearly three years ago and chose this area specifically because we wanted a village environment to bring up our daughter.

We wanted to get away from traffic and congestion and enjoy the green belt around us.

The proposed development of homes on green belt sites at much higher densities than currently exist would be totally out of character with existing housing. It is also unsustainable in terms of drainage, road capacity, schools, shops, medical facilities, parking and public transport.

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

Attached documents:

Comment ID: PSLPS16/5282  Respondent: 15504833 / Robert Lynch  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 - there is insufficient access and traffic capacity. Especially the junction with Send Road, opposite Sandy Lane.

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

Attached documents:

Comment ID: PSLPS16/5283  Respondent: 15504833 / Robert Lynch  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 building 400 houses and 7000 sq metres of industrial space at Garlick's arch - this Greenbelt site is not needed - any such development of industry site can be at Slyfield. There is insufficient traffic capacity on the single lane country roads giving access.

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

Attached documents:

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I OBJECT to a new interchange with the A3 at Burnt Common - Much of the extra traffic generated by new housing developments at Wisley, Gosden and and Guildford would go through Send, on Send Road - a narrow road already causing traffic delays. Extra traffic would cause gridlock, pollution and general amenity degradation.

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 development of 40 houses and 2 travellers' pitches at Send Hill. It would also degrade a site of natural beauty.

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

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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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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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Send village being removed from the Greenbelt. This will open a door to developers who will completely change the nature of Send as a buffer between Woking and Guildford</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>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPS16/5288  Respondent: 15504865 / Neville and Pat Bagley  Agent:</th>
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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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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>Objection to Normandy (policy A46)</td>
</tr>
<tr>
<td>Have you NO consideration for your local community, It is impossible to turn out of pinewood rd onto the A323 Guildford rd.</td>
</tr>
<tr>
<td>It is taking us 3 weeks to get a doctors appointment.</td>
</tr>
<tr>
<td>Please tell us how a couple of thousand more houses are going to improve this.</td>
</tr>
<tr>
<td>Have you tried to park down at our locale shops, by vale furnishings.</td>
</tr>
<tr>
<td>So you intend to make even this more difficult.</td>
</tr>
<tr>
<td>Proposing a secondary school, near the -A323 whose idea was that one.</td>
</tr>
<tr>
<td>Remember we have VOTE.</td>
</tr>
<tr>
<td>Please take a look at the Normandy Surrey boundary We are in Normandy, not Ash Aldershot as you put our postal address?</td>
</tr>
<tr>
<td>As per all the residents of Pinewood rd. Upper Pinewood rd.&amp; Kirriemuir gardens.</td>
</tr>
<tr>
<td>This affects motor, house insurance.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
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</table>
Comment ID: PSLPS16/5290    Respondent: 15504897 / Frank Shepherd    Agent: 

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

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

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

I object to the draft local plan.

The A3 problems have been with us for many years. how can planning for an enormous increase in housing be done before infrastructure ie A3 and local roads requirements is in place, or at least planned.

The best solution for the A3 would be a tunnel. The obvious place for the tunnel entrance would be Gosden Hill Farm which precludes building 2000 houses. A smaller number might be accommodated.

If Gosden Hill were to be built as planned then the effect on Burpham (where I live) would be dreadful. Thousands more vehicles would come through Burpham both to enter and leave the development. Access should be both Southbound and Northbound to the A3 and a four-way junction would be essential.

The calculation for the number of houses required is suspect. The figures used are not released - why?

As a member of Burpham Community Association I support their objections to the plans. They are more expert than I.

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

Attached documents:

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Comment ID: PSLPA16/2576    Respondent: 15504929 / William Scott    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: PSLPA16/2578  Respondent: 15504929 / William Scott  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.

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: PSLPS16/5311  Respondent: 15504929 / William Scott  Agent:

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

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

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

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

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (88). There are no 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 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) Why not?

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) Some of my friends have struggled to get school places as it is!

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: PSLPS16/5312  Respondent: 15504929 / William Scott  Agent:

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

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

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

I object to 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.

I already live on a busy road. This will have a very negative impact on my health and wellbeing.

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: PSLPP16/10701  Respondent: 15504929 / William Scott  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. I am a 16 year old who is really interested in country life and want to preserve the woodlands.

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

Attached documents:

Comment ID: PSLPP16/10698  Respondent: 15504929 / William Scott  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.
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 81c, B2 and 88) 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.

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

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley.

The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

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

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

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, I (and other residents) 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.

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:**

<table>
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<th>Comment ID: PSLPP16/10705</th>
<th>Respondent: 15504929 / William Scott</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 due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
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<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp; M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.</td>
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<td>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 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 our health. Hold on a minute, I live here and I object!

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

Attached documents:

Comment ID: PSLPP16/10694  Respondent: 15504929 / William Scott  Agent:

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

Do you consider this section of the document; complies 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:

Comment ID: PSLPP16/10697  Respondent: 15504929 / William Scott  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.

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

Attached documents:

Comment ID: PSLPP16/10691  Respondent: 15504929 / William Scott  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 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 (where I live), Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. I do not believe the proposed developments meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. We do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. I know this because I can't drive yet and rely on lifts and public transport.

Residents will have few options, but to be reliant on cars. 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. Surely 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. I know this as I have to use them daily. 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:** PSLPP16/10692  **Respondent:** 15504929 / William 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): ()

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, we 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. On MY community!

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

**Attached documents:**

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**Comment ID:** PSLPA16/2574  **Respondent:** 15504993 / Harry Eke  **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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Objection to 2016 Local Plan

I OBJECT to the Guildford draft plan and its impact on the villages of Send and Ripley in particular plans A25, A35, A42, A43, A43a and A44

- I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area.

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

Attached documents:

Comment ID: PSLPS16/5302  Respondent: 15504993 / Harry Eke  Agent:

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

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

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

- I OBJECT to the proposed development of Gosden Hill Farm (Policy A25) and its inevitable impact on the roads around Send. Despite assurances of an additional railway station, commuters will utilise the opportunity to leave the A3 at the existing Burnt Common roundabout and travel on the faster Woking to Waterloo line, rather than use the slower Guildford line.

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

Attached documents:

Comment ID: PSLPS16/5303  Respondent: 15504993 / Harry Eke  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 proposed development Clockbarn Nursery (policy A42) due to the impact that the additional traffic will have on small local roads. Send Road is already frequently blocked by HGVs trying to turn into Tannery Lane; this can only be made worse by additional traffic using the same road.

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

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<td>• I OBJECT to Policy A43a (Land for North facing slip roads to/from A3 at send Marsh/Burnt Common) This would necessitate a 4-way junction at Burnt Common and would inevitably increase the amount of traffic using the local roads in Send. This junction would worsen the problem of drivers using Send as a cut through from Guildford to Woking on local roads that are just not intended for this purpose.</td>
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<td>• I PARTICULARLY OBJECT to the proposal in Policy A44 of the local plan Land West of Winds Ridge and Send Hill on the grounds that:</td>
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<td>• The site is not large enough for the proposed use.</td>
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<td>• The siting of two travellers pitches in Send Hill will be detrimental to both Send Hill and the Send/Ripley areas with house values and people’s desire to move into the area adversely affected.</td>
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<tr>
<td>• 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.</td>
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<td>• Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status and would be spoilt by development.</td>
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<td>• The existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.</td>
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<td>• Too many houses are proposed to Send/ Send Marsh are and the impact on traffic congestion and local services would be unacceptable.</td>
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<td>• 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.</td>
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<td>• This would cause loss of village identity, be detrimental to the community and increased flood risk.</td>
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<td>• 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 properties.</td>
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<td>• GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.</td>
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<td>• 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.</td>
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</table>
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. It also Identifies proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes concern as to what it does contain and dangers if disturbed.

Overall, I OBJECT to the Local Plan. I would like these comments to be seen and considered by a 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: PSLPP16/10696  Respondent: 15504993 / Harry Eke  Agent:

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

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

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

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- I OBJECT to the impact on the infrastructure around the villages. The roads around Send and Ripley are already congested and cannot cope with the current needs. The Local Plan does not incorporate a detailed transport infrastructure strategy that would demonstrate how the road network would support the additional pressure on the roads and other amenities if the proposed development went ahead.

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

Attached documents:

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Comment ID: PSLPP16/10695  Respondent: 15504993 / Harry Eke  Agent:

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

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

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

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- I OBJECT to the impact on the greenbelt status of the villages

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

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

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

- I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000 and if it goes ahead Send and Ripley will become a conurbation of Woking and Guildford.

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

Attached documents:

Comment ID: PSLPS16/5300  Respondent: 15505025 / Ellen Knox  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 would like to register my objection to the inclusion of the land to east of the paddocks in the proposed submission Local Plan: strategy and sites 2016.

The inclusion of this piece of greenbelt land to the policy is in excess of the housing requirement in the area and there is by no means exceptional circumstances that require development on this land.

We bought our property in good faith that the protected green belt area in which we live would remain so. We live here because we want to bring our family up in a rural area; we access the house via an unadopted road and have no gas supply. Our neighbours including the owners of the local working farms work hard to protect and cherish the countryside we live in.

Flexford Road runs next to our property and is incapable of sustaining an increase of road users. The bridge floods every time it rains and Flexford road adjacent to the proposed site collects surface water after heavy downpours. The site itself can also flood at times of heavy rain. I have called the council numerous times to report the flooding on road and also the foul smell of sewage that can occur at times of flooding. It by no means feels a highway or drainage system capable of enduring a larger population.

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

Attached documents:

Comment ID: PSLPS16/5305  Respondent: 15505089 / Richard Horton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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 2 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.

Second, 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?

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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. This is the first key point.
- 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. This statement is based on information that is 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).
• 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 which cannot support the current flow of traffic and the surface water which does not drain away
  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. The wide vehicle cause damage to the narrow country lanes
  4. The danger this traffic will be to local cyclists, pedestrians and horse riders 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 and roads that a large bus can safely travel on. 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>
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<th>Comment ID: PSLPP16/10710</th>
<th>Respondent: 15505217 / John Mansell</th>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>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.</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>Attached documents:</strong></td>
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<tr>
<th>Comment ID: PSLPP16/10708</th>
<th>Respondent: 15505217 / John Mansell</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</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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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>I have a particular concern about the way the Local Plan is worded and put together.</td>
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<tr>
<td>It is not worded in a way that is understandable for people with limited reading ability. Most people would not be able to read 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.</td>
<td></td>
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<tr>
<td>I do not think the Draft Local Plan takes into account the real impact of huge areas of development around Guildford and beyond.</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>
<th>Comment ID: PSLPS16/5315</th>
<th>Respondent: 15505249 / Victoria Murphy</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I believe there is a planning application in and I would like to raise our families objections to until we have certain guarantees and questions have been answered.

Why is such a large development required? Why could not a series of smaller developments be done that would not be so catastrophic on small villages but instead gradually increase their size so as not to break to eco system of that community.

Why are urban brownfield sites not being considered instead? I agree we need to provide housing in the SE of England but this is a huge development that would change the human and natural ecosystems of the area.

We need some assurances that if this goes ahead there will be additional schools built, both junior and senior, nurseries funded because we are talking about 1000's of additional children and the current schools can't cope nor do we need to have mega schools with masses of classes per year.

Roads - what additional road widening, traffic control measures, new roads are going to be built to cope with the traffic? Cobham traffic is already a joke because the parking bays prevent cars from going through but now this development would add to those queues without any considerations of the issues we have already. There simply isn't the parking spaces nor the volume of shops to cope with that number of additional people. What is to be done?

Travel - the local train services cannot support this type of development, assuming this means there is an additional 1000 per day who travel into London, how many extra trains are SW going to put on, will they be doing fast trains as well as slow trains like they do at Woking? There isn't enough parking at any of the trains along the line to cater for these additional people, there is never more than 30 spaces free at Cobham in any one day. If you think people are going to be able to walk to these stations then that is a joke because some roads in the local area don't have pavements, in fact an extraordinary number dont so how are people expected to walk safely to these stations?

I don't object to building more houses but I do strongly object to large developments without considered planning of the impact on other communities and their current way of living. This would have a serious impact on my way of living and would mean Cobham is no longer the place I bought into as it would take longer to get around, less certainty about where to shop, where to park, whether I would get a parking space at the station, time to travel to work etc. Do this in a considered way with more disperse developments spread around the area and it's less impactful.

Please acknowledge this email so that I know it has been logged as a formal objection.

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

Attached documents:

Comment ID: PSLPS16/5316  Respondent: 15505281 / Clive Nichols  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 proposal to build 1100 houses in Normandy. The traffic would be horrendous & the services such as sewage etc. could not cope, the plan would double the size of the village & unless we are going to get new upgraded services the proposed development will spell disaster for all.

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

Attached documents:

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Comment ID: PSLPA16/2585  Respondent: 15505313 / Samantha J S Perry  Agent:

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

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

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

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

This figure cannot be verified because the Council will not publish the SHMA report. This lack of transparency is deplorable for a realistic consultation of the Plan to be conducted.

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

Attached documents:

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Comment ID: PSLPS16/5320  Respondent: 15505313 / Samantha J S Perry  Agent:

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

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

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

I object to the building of 45 houses at Clockburn Nursery.

The inadequacy of Tannery Lane and the nearby roads to cope with the additional traffic caused by the unwanted development of 64 apartments and a marina must not be compounded by adding even more traffic if the Clockburn Nursery development is granted. This over-development must not be allowed to happen if we are to avoid appalling traffic destroying the enjoyment of this quiet village.

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

Attached documents:
### Comment ID: PSLPS16/5317  Respondent: 15505313 / Samantha J S Perry  Agent:

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

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

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

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

Garlick’s Arch is protected from development as Green Belt.

The Ancient Woodland on the Garlick's Arch site (A43), including over 80 ancient oak trees, is something a civilized society value but the vast development that is proposed would double the built area in the locality and would irrevocably damage the character of this area for future generations.

As already stated, there are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2).

The site at Garlick's Arch (A43) is also liable to frequent flooding and is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore, the Council’s assessment is not good enough to be included in the plan.

The Plan states the preference is to use previously developed land but GBC have, for no reason, removed a brownfield site at Burnt Common and replaced it with Garlick’s Arch. This site should be re-instated as a brownfield site and additional commercial capacity should be taken up in Slyfield, that already has excellent and appropriate facilities

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

Attached documents:

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### Comment ID: PSLPS16/5318  Respondent: 15505313 / Samantha J S Perry  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. The addition will draw in a huge amount of ‘through’ traffic from London/M25 to Woking. This is not sustainable as these roads are already overloaded and have no scope to be improved. It will result in gridlock and would also cause appalling deterioration to the air quality

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

Attached documents:

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### Comment ID: PSLPS16/5319  Respondent: 15505313 / Samantha J S Perry  Agent:

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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</th>
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<tr>
<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 travellers' pitches at Send Hill.  
The narrow width single access road provides insufficient access and is inappropriate. Furthermore, the subsoil of the proposed site contains unsafe landfill waste that has been documented and registered at the GBC. This high amenity area set in beautiful countryside should not be lost by unnecessary 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: PSLPP16/10723  Respondent: 15505313 / Samantha J S Perry  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
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<tr>
<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)  
Removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) would utterly destroy the character of the area. This must be avoided at all costs. Retention of the UK's Green Belt has been supported by every government for decades and has always been more critical the closer to London. It would be intolerable if the London sprawl is allowed to extend to Guildford and beyond its southern borders.

There are more than enough brownfield sites in the Guildford area that should be developed for the Plan.

There are no exceptional circumstances for these villages and sites being removed from the Green Belt, as required by the National Planning Policy (Policy P2).

Central Government state clearly that housing need is not an exceptional circumstance.

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

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the Borough Wide Strategy (Policy S2)</td>
</tr>
<tr>
<td>All the other Borough Councils in Surrey are at odds with GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure. This must be addressed.</td>
</tr>
<tr>
<td>There is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). Only 11% of the existing housing is in this area but 36% of all the Plan’s new housing is proposed here. Even with the overall figure being reduced, the Plan should be more balanced across the borough.</td>
</tr>
<tr>
<td>If 5,036 houses are built between the M25 and Burpham (about 5 miles), it will inevitably lead to a merging urbanisation of identities of the villages. This is unacceptable!</td>
</tr>
<tr>
<td>It is common sense that new development should be in should be in urban areas where there is already sustainable transport.</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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<th>Comment ID: PSLPS16/5321</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum</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>Attached documents:</td>
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</table>
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: PSLPS16/5322  Respondent: 15505377 / Simon Wright  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 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: PSLPS16/5323  Respondent: 15505377 / Simon Wright  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 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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Comment ID: PSLPS16/5324  Respondent: 15505377 / Simon Wright  Agent:
<table>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I OBJECT to Policy 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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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPS16/5325  Respondent: 15505377 / Simon Wright  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 Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt</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>Attached documents:</td>
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| Comment ID: PSLPS16/5326  Respondent: 15505377 / Simon Wright  Agent: |

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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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Comment ID: PSLPP16/10731  Respondent: 15505377 / Simon 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): ()

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: PSLPP16/10732  Respondent: 15505377 / Simon Wright  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: PSLPP16/10729  Respondent: 15505377 / Simon Wright  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?
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<tr>
<th>Comment ID: PSLPP16/10730</th>
<th>Respondent: 15505377 / Simon Wright</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the 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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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: pslp172/3640</th>
<th>Respondent: 15505377 / Simon Wright</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to policy A42 change at Clockbarn Nursery, Tannery Lane due to the following points:</td>
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<tr>
<td>The site has very restricted access along Tannery Lane which is single track for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical with 45 homes, so an increase of 33% is just ridiculous.</td>
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<tr>
<td>Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with traffic for 45 extra homes, so an increase is not going to work.</td>
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<tr>
<td>Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. The traffic for this development has not yet been added to the current traffic situation.</td>
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<tr>
<td>The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane, so an increase in homes just exacerbates the problem.</td>
<td></td>
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</tbody>
</table>
This change ignores hundreds of previous objections. These have been made by people who live locally, the people who know the area best, they should be listened to, not pushed to one side.

Surface water flooding will be increased with the original number of homes, additional homes will make the situation worse still.

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

Attached documents:

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**Comment ID:** pslp172/3637  **Respondent:** 15505377 / Simon Wright  **Agent:**

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

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

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

**I object to policy A43 Garlicks Arch due to the following points.**

There is no proven demand for plots to accommodate Travelling Showpeople.

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt land. 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. It constitutes over development. These further changes to the plan are not required.

It is an unsustainable location. It will undoubtedly cause traffic chaos on the minor surrounding roads. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion, anyone who lives in these areas will confirm that this is the case. Substantially more vehicle movements will result in even more congestion and greater pollution. Residents and the environment will suffer as a result.

This area contains ancient woodland dating back to the 16th century, which should be preserved. There is no good reason to tamper with it.

This site is identified as being in a Flood Zone 2 and regularly floods during winter months.

This site contains land which is heavily contaminated by many years of shooting with lead shot.

Above all, the latest changes to this site have completely ignored the thousands of previous comments from residents (who know the area best of all) during the 2016 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:** pslp172/3638  **Respondent:** 15505377 / Simon Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
I object to Policy A58 Burnt Common due to the following points:

There is no requirement for new industrial or warehouse space as there is availability at Slyfield and Guildford Industrial estates, developing in this way is pure stupidity and is just building for the sake of it.

Additionally, this site is in the Green Belt, there are no exceptional circumstances to justify development here.

According to the 2017 Employment Land Need Assessment there is a reduction in demand to 3.9 hectares for industrial land in the whole borough. Why is there a huge allocation of 10 hectares in Send? This policy has not been thought through at all.

Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.

Any extra traffic would cause traffic chaos in the local area with its small roads, adding commercial vehicles to this would be completely unsustainable.

This site was deleted from the 2014 Local Plan due to previous objections, why has it returned?

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>PSLPA16/2587</th>
<th>Respondent:</th>
<th>15505409 / Ian Cunningham</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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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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<th>Comment ID:</th>
<th>PSLPS16/5327</th>
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<tr>
<td>Document:</td>
<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 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: PSLPS16/5328   Respondent: 15505409 / Ian Cunningham   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: PSLPS16/5329   Respondent: 15505409 / Ian Cunningham   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: PSLPS16/5330  Respondent: 15505409 / Ian Cunningham  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: PSLPS16/5331  Respondent: 15505409 / Ian Cunningham  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: PSLPS16/5332  Respondent: 15505409 / Ian Cunningham  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:

Comment ID: PSLPP16/10735  Respondent: 15505409 / Ian Cunningham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/10736  Respondent: 15505409 / Ian Cunningham  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: PSLPP16/10733  Respondent: 15505409 / Ian Cunningham  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: | PSLPP16/10734 | Respondent: | 15505409 / Ian Cunningham | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

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: | PSLPA16/2588 | Respondent: | 15505537 / Vincent Carley | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |

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: PSLPS16/5334</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

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

**Attached documents:**

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

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

I OBJECT to 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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Comment ID: PSLPS16/5337  Respondent: 15505537 / Vincent Carley  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: PSLPS16/5338  Respondent: 15505537 / Vincent Carley  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: PSLPS16/5339  Respondent: 15505537 / Vincent Carley  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: PSLPP16/10739  Respondent: 15505537 / Vincent Carley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/10740  Respondent: 15505537 / Vincent Carley  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: PSLPP16/10737  Respondent: 15505537 / Vincent Carley  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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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/10738  Respondent: 15505537 / Vincent Carley  Agent:

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

Do you consider this section of the document; complies with 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: PSLPA16/2589  Respondent: 15505601 / Emma Robson  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?
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?

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 Policy A43 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?
**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?**

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Do you consider this section of the document; complies with 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: PSLPS16/5345  Respondent: 15505601 / Emma Robson  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: PSLPP16/10747  Respondent: 15505601 / Emma 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 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: PSLPP16/10748  Respondent: 15505601 / Emma Robson  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? ( )
| Comment ID: PSLPP16/10744 | Respondent: 15505601 / Emma 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 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: PSLPP16/10745 | Respondent: 15505601 / Emma Robson | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with 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: PSLPS16/5346 | Respondent: 15505633 / John Hume | 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

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

For almost twenty years I have been a regular visitor to the beautiful greenbelt village of East Horsley and its neighbouring communities and villages. I object to the draft Local Plan for the following key reasons:

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

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

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

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

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

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) – where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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

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

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

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

Attached documents:

Comment ID: PSLPS16/5347  Respondent: 15505633 / John Hume  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): ()

As a regular visitor to East Horsley and its neighbouring communities and villages I was horrified to hear of the proposed development at Wisley Airfield in what is the heart of greenbelt land. Having witnessed the many developments that have already had in my opinion a negative impact on the beauty of this wonderful part of Surrey, this development is totally out of character and will without doubt spoil what has always been a protected untouched halcyon of days gone by. To say that the proposed development would be grossly out of context is a definite understatement. I trust that Guildford Borough Council will have the common sense to reject this application which would be much better suited to some of the many brownfield sites crying out for redevelopment.

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

Attached documents:

Comment ID: PSLPS16/6927  Respondent: 15505633 / John Hume  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): ()

443
As a regular visitor and former resident of East Horsley, 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.

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

Attached documents:

Comment ID: pslp173/233  Respondent: 15505633 / John Hume  Agent:

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

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

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

I am writing to register my strong objection to the latest draft of the Guildford Borough Council local plan.

I am very disappointed to see that it still proposes to inset East Horsley from the Greenbelt in order to facilitate the development of 100 homes proposed near to Horsley Station and over 2000 homes on Wisley Airfield. Why, when the ONS forecast predicts only a 10.4% increase in population size for Guildford does GBC seek to increase housing stock by 22%?

At present the local infrastructure is not sufficient to support the demand put on it in terms of schooling, medical facilities and transport. How does GBC propose that a huge increase in demand will be slotted into the local infrastructure?

When you consider all the proposed changes to East Horsley, the equation proposed by GBC simply does not add up.

Again, please note my strong objection to this latest draft of the Guildford Borough Council local plan.

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

Attached documents:

Comment ID: PSLPS16/5348  Respondent: 15505729 / Laura Hume  Agent:

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

Page 445 of 1920
As a regular visitor to East Horsley and its neighbouring communities and villages I was horrified to hear of the proposed development at Wisley Airfield in what is the heart of greenbelt land. Having witnessed the many developments that have already had in my opinion a negative impact on the beauty of this wonderful part of Surrey, this development is totally out of character and will without doubt spoil what has always been a protected untouched halcyon of days gone by. To say that the proposed development would be grossly out of context is a definite understatement. I trust that Guildford Borough Council will have the common sense to reject this application which would be much better suited to some of the many brownfield sites crying out for redevelopment.

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

Attached documents:

Comment ID: PSLPS16/5349  Respondent: 15505729 / Laura Hume  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

For almost twenty years I have been a regular visitor to the beautiful greenbelt village of East Horsley and its neighbouring communities and villages. I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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

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

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

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

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

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

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

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

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

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

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

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: PSLPS16/5521  Respondent: 15505761 / James McMarken  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: PSLPS16/5487  Respondent: 15505761 / James McMarken  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: PSLPS16/5426  Respondent: 15505761 / James McMarken  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: PSLPS16/5427  Respondent: 15505761 / James McMarken  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: PSLPS16/5479  Respondent: 15505761 / James McMarken  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: PSLPS16/5446  Respondent: 15505761 / James McMarken  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: PSLPP16/10818  Respondent: 15505761 / James McMarken  Agent:

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

Do you consider this section of the document; complies 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: PSLPP16/10753  Respondent: 15505761 / James McMarken  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? ( )
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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

Attached documents:

Comment ID: PSLPA16/2593  Respondent: 15505793 / Edward Goddard  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: PSLPS16/5350  Respondent: 15505793 / Edward Goddard  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?

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<tr>
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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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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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<th>Comment ID: PSLPS16/5358</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</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

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

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<th>Comment ID: PSLPP16/10756</th>
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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: PSLPP16/10757  Respondent: 15505793 / Edward Goddard  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: PSLPP16/10754  Respondent: 15505793 / Edward Goddard  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?

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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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<th>Comment ID: PSLPS16/5357  Respondent: 15505825 / Liane Jarman  Agent:</th>
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I object to the building of thousands of homes and the business park on Blackwell Farm in particular.

**Reasons stated below:**

Guildford can't cope with the current traffic. To add more vehicles to the congested and often gridlocked roads is ridiculous. It's not just at rush hour - it's bad at the weekends too.

The South East does not have enough water. How are we going to supply an extra 2000 homes?

I don't believe the sewerage infrastructure will cope well either. The climate is changing. There will be more flooding. Fields soak rainwater up. Housing estates don't.

I live in Guildford and I've just had to wait 21 days to see a GP. Who's going to look after the thousands of new residents?

No one wants more pollution - air quality will get worse leading to more health problems. More noise from all the additional traffic and more light pollution.

I walk past Blackwell Farm everyday. I see deer, skylarks, buzzards, kites, shrews and butterflies everyday. Where will they go if we destroy their habitat? There are orchids too, and a myriad of plants and insects.

I also walk the ancient woodland? It's beautiful and peaceful. The new proposed road from the Surrey Research Park, Gill Avenue to the new estate will cut through the important Woodland which was the original, defensible Green Belt boundary.

I object to the Surrey Research Park expansion. There are empty office blocks all over Guildford. More traffic. More lorries. No thanks.
All of the land earmarked is either an Area of Outstanding Natural Beauty, Area of Great Landscape Value or Greenbelt and should be protected by law. Lose it and it's gone forever. Unimportant to the greedy developers. Devastating to Guildford residents.

Guildford was lovely when I moved here 10 years ago. It's not so nice now. I won't stay if this plan goes ahead.

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

Attached documents:

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**Comment ID:** pslp172/3816  **Respondent:** 15505825 / Liane Jarman  **Agent:**

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

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

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

I object to the building of nearly 2000 homes and the business park on Blackwell Farm in particular.

Reasons stated below:

Guildford can't cope with the current traffic. To add more vehicles to the congested and often gridlocked roads is ridiculous. It's not just at rush hour - it's bad at the weekends too.

The South East does not have enough water. How are we going to supply an extra 2000 homes?

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

Comment ID: PSLPP16/10759  Respondent: 15505857 / Karen Hookham  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): ()

Guildford transport system is already at breaking point, and the additional cars will not ease matters.
The schools are oversubscribed.
The doctors surgeries are full.
The trains are overpopulated.

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

Attached documents:

Comment ID: PSLPP16/10758  Respondent: 15505857 / Karen Hookham  Agent:

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

Do you consider this section of 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 Please do not approve the plans to build on Guildford Greenbelt land.
The surrounding green spaces are areas of extreme beauty, home to many wild animals and beautiful rare birds such as wild deer, shrews, kites and buzzards. Where will they go of the land is lost?
As a keen horse rider in the local area, I am disheartened that the beautiful landscapes and historic woodlands, once built on will be lost forever. Never replaceable. Gone. Forever.
The fields would no longer absorb the rainfall, deterring flooding to the local population.

Please, please do not build on the greenbelt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/2596  Respondent: 15505921 / Andrew Forest  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: PSLPS16/5361  Respondent: 15505921 / Andrew Forest  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: PSLPS16/5362  Respondent: 15505921 / Andrew Forest  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

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

Attached documents:

Comment ID: PSLPS16/5363  Respondent: 15505921 / Andrew Forest  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: PSLPS16/5364  Respondent: 15505921 / Andrew Forest  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: PSLPS16/5365  Respondent: 15505921 / Andrew Forest  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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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: PSLPS16/5366  Respondent: 15505921 / Andrew Forest  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: PSLPP16/10769  Respondent: 15505921 / Andrew Forest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies 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: PSLPP16/10770  Respondent: 15505921 / Andrew Forest  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: PSLPP16/10767  Respondent: 15505921 / Andrew Forest  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: PSLPP16/10768  Respondent: 15505921 / Andrew Forest  Agent:

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

Do you consider this section of the document; complies with 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: PSLPA16/2597  Respondent: 15505985 / Emma Clark  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): ()

Objections to the Guildford Borough Council Proposed Submission Local Plan (June 2016)

I wish to express my strong concerns and objection to Guildford Borough Council to object to the Council’s ill-conceived Draft Local Plan in relation to the proposed developments (as shown in table below) in the village of Send. I believe that this plan is not in compliance with the regulations with which it is required to comply. My reasons and arguments against are explained below.

| A42  | Clockbarn Nursery, Tannery Lane, Send | Send Homes (C3) | 45 |
| A43  | Land at Garlick's Arch, Send Marsh Burnt Common and Ripley | Send and Lovelace | Homes (C3) and employment floorspace (B1c, B2, B8) | 400 |
| A43a | Land for new north facing slip roads to/ from A3 at Send Marsh/ Burnt Common | Send and Clandon and Horsley new northbound on-slip to the A3 trunk road from A247 Clandon Road and a new southbound off-slip from the A3 trunk road to A247 Clandon Road |
| A44  | Land west of Winds Ridge and Send Hill, Send | Send | Homes (C3) and traveller pitches (sui generis) | 40 |

Send is a small, quiet village surrounded by a number of areas of greenbelt land and development of these areas would cause numerous negative impacts to both the environment and character of the village. I therefore very strongly object to the councils proposed development plans.

Over recent years Send has already seen some more housing developments and as a result has increased the population of this village. The proposed plan to develop a further 485 homes is ludicrous as the current infrastructure in place in this village is not able to cope with an increased number of people. The roads are already in a poor state in places and an
increased number of cars using them will only lead to further deterioration. More cars will add to the traffic problems, especially during rush hour times, where it already takes a long time to get out onto the (((((Portsmouth Road)))) from Send Marsh Road and leading to traffic queues to back up on the small roads through the village of Send Marsh. The housing development will likely bring at least 1-2 cars per household leading to a further 485-970 cars and that is not including the additional cars that will be accessing the area at peak times to get to the new employment spaces that are being proposed. New slip roads accessing already busy areas of the A3, especially at peak times would only increase the risk of accidents along those sections of roads as people try to join the A3 flow. I do not believe it is a sensible, well thought idea to go ahead with a development plan that could increase the chances of road traffic accidents.

Increased population size will add to the strain on The Villages Medical Centre, which is already very busy. Further development will make it near impossible to be able to get an appointment within a reasonable time on an already heavily strained Centre. As Send it situated between two large towns, Woking and Guildford, which provide good access to local facilities and transport links, it makes it a prime location for families to establish. The children that grow up here will need access to a local school and Send only has 1 infant school and 1 junior school which could become over-subscribed from an increased number of residents that would be caused from the additional houses that are being proposed to be built and increase the pressure on these schools.

The greenbelt land provides an open feel to the area and gives Send its characteristic of being a small village with a more rural feel. The development of employment floor space and resulting loss of this greenbelt land would see Send lose its identity and start to merge with the larger towns of Woking and Guildford. Greenbelt land is aimed to help minimise urban sprawl and is not a place for industrial development. Aside from this, greenbelt land provides important spaces for wildlife to survive amongst the ever developing landscape. Building on this land will see a loss of both plant and animal species therefore reducing biodiversity of organisms in the area. These species will either die out due to habitat destruction or have to find new homes, leading to competition within other habitats and putting strain on other ecosystems nearby.

New development plans should impact the lives of the residents in a positive manner and as you can see from my reasons stated above this would not be the case with these proposed ideas and why I strongly object to these development plans. I trust that you will take these points into consideration and drop the proposed plans.

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

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<thead>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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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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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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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

Attached documents:

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Comment ID: PSLPS16/5370  Respondent: 15506049 / Mandy Shoesmith  Agent:

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

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

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

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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

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Comment ID: PSLPS16/5372  Respondent: 15506049 / Mandy Shoesmith  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: PSLPS16/5373  Respondent: 15506049 / Mandy Shoesmith  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:

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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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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?
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?

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?
Do you consider this section of the document; complies with 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: PSLPS16/5428  Respondent: 15506081 / Dale 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: PSLPS16/5477  Respondent: 15506081 / Dale 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): ()
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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.

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:

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Comment ID: PSLPP16/10774  Respondent: 15506081 / Dale Miller  Agent:

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

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

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

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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

Attached documents:

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Comment ID: PSLPA16/2641  Respondent: 15506113 / Sheila Taylor  Agent:

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

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

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

I OBJECT to 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: PSLPS16/5525  Respondent: 15506113 / Sheila Taylor  Agent:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5430  Respondent: 15506113 / Sheila Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

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

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

Attached documents:

Comment ID: PSLPS16/5475  Respondent: 15506113 / Sheila Taylor  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: PSLPS16/5456  Respondent: 15506113 / Sheila Taylor  Agent:
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: PSLPP16/10825  Respondent: 15506113 / Sheila Taylor  Agent:

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: PSLPP16/10849  Respondent: 15506113 / Sheila Taylor  Agent:

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.

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

Attached documents:

Comment ID: PSLPS16/5378  Respondent: 15506177 / Jean Calas-Hathaway  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: PSLPS16/5379  Respondent: 15506177 / Jean Calas-Hathaway  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: PSLPS16/5380  Respondent: 15506177 / Jean Calas-Hathaway  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: PSLPS16/5381   Respondent: 15506177 / Jean Calas-Hathaway  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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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5382   Respondent: 15506177 / Jean Calas-Hathaway  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: PSLPS16/5383  Respondent: 15506177 / Jean Calas-Hathaway  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: PSLPP16/10799  Respondent: 15506177 / Jean Calas-Hathaway  Agent:

Document: Proposed Submission Local Plan: strategy 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

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

Attached documents:

Comment ID: PSLPP16/10800  Respondent: 15506177 / Jean Calas-Hathaway  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:

Comment ID:  PSLPP16/10797   Respondent:  15506177 / Jean Calas-Hathaway   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:  PSLPP16/10798   Respondent:  15506177 / Jean Calas-Hathaway   Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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:  PSLPA16/2639   Respondent:  15506209 / Rosemary Richardson   Agent:  

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

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<tr>
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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?

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

Attached documents:
Comment ID: PSLPP16/10845  Respondent: 15506209 / Rosemary 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 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: PSLPP16/10790  Respondent: 15506209 / Rosemary Richardson  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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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10794  Respondent: 15506241 / Penny Whitlock  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): ()
If houses are built I would want social housing where there is a need, not housing for profit.

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

Attached documents:

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Comment ID: PSLPP16/10795  Respondent: 15506241 / Penny Whitlock  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): ()

People can suffer from depression when their view/surroundings change. Infrastructure is not developing alongside this. We need to see plans for more schools and medical provision.

Station parking is full now. Plans?

Roads are small pot holed and inadequate for expansion and drainage is awful.

We love our village and really do not want a small town!

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

Attached documents:

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Comment ID: PSLPP16/10792  Respondent: 15506241 / Penny Whitlock  Agent:

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

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

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

The Green belt is meant to be protected land. Have you really exhausted all other possibilities?

This breaks a long standing agreement that Green belt is protected from development. People will not trust you to protect them.

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

Attached documents:

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Comment ID: PSLPP16/10791  Respondent: 15506241 / Penny Whitlock  Agent:
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Please consider these following objections to the local plan. I would hold you answerable to all these objections.

How can you justify this when so many long term vacant properties are in the Guildford borough?

People have moved here due to its village not suburban feel.

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

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<th>Comment ID: PSLPA16/2638  Respondent: 15506305 / Pamela Sadler  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: PSLPS16/5493  Respondent: 15506305 / Pamela Sadler  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: PSLPS16/5416  Respondent: 15506305 / Pamela 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): ()

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

Attached documents:
Comment ID: PSLPS16/5436  Respondent: 15506305 / Pamela Sadler  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: PSLPS16/5472  Respondent: 15506305 / Pamela Sadler  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: PSLPS16/5459  Respondent: 15506305 / Pamela Sadler  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 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?

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

I moved to Send Marsh 25 years ago with my husband and young family attracted by it’s rural qualities and the fact that it benefited from protection from major redevelopment by the green belt. I understood that the green belt boundaries would remain intact in perpetuity.

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

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<th>Comment ID: PSLPS16/5396</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 fact that the first notification I received of the proposed changes to include development of Garlicks Arch was as in early June via a leaflet distributed by a concerned neighbour and not via Guildford Borough Council.

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

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate.
This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

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

Attached documents:

Comment ID: PSLPS16/5397  Respondent: 15506369 / Sheila Jennings-Giles  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?

Attached documents:

Comment ID: PSLPS16/5398  Respondent: 15506369 / Sheila Jennings-Giles  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

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

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

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

Attached documents:

Comment ID: PSLPP16/10848  Respondent: 15506369 / Sheila Jennings-Giles  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 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: PSLP16/10805  Respondent: 15506369 / Sheila Jennings-Giles  Agent:

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

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

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

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

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

Attached documents:

Comment ID: SQLP16/1356  Respondent: 15506369 / Sheila Jennings-Giles  Agent:

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

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

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

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

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

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<th>Comment ID: PSLPA16/2636</th>
<th>Respondent: 15506401 / Alicia Robinson</th>
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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: PSLPS16/5441  Respondent: 15506401 / Alicia Robinson  Agent:

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

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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:

Comment ID: PSLPS16/5470  Respondent: 15506401 / Alicia 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): ()

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: PSLPS16/5463  Respondent: 15506401 / Alicia Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
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: PSLPP16/10835  Respondent: 15506401 / Alicia Robinson  Agent:

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

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: PSLPP16/10842  Respondent: 15506401 / Alicia Robinson  Agent:

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

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:

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 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.
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: pslp172/4552  Respondent: 15506401 / Alicia Robinson  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
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: pslp172/4553  Respondent: 15506401 / Alicia Robinson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

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Comment ID: pslp171/2986  
Respondent: 15506401 / Alicia Robinson  
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/584  
Respondent: 15506401 / Alicia Robinson  
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?**

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

Attached documents:

Comment ID: PSLPS16/5469  Respondent: 15506433 / Geoffrey 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): ()

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: PSLPS16/5465  Respondent: 15506433 / Geoffrey 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? ( )

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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: PSLPP16/10836  Respondent: 15506433 / Geoffrey Robinson  Agent:  

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: PSLPP16/10841  Respondent: 15506433 / Geoffrey Robinson  Agent:

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

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Attached documents:

Comment ID: PSLPA16/2603  Respondent: 15506465 / Lisa Garner  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): ()

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

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**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 A43

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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.

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Attached documents:

Comment ID: PSLPS16/5387  Respondent: 15506465 / Lisa Garner  Agent:

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

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Comment ID: PSLPS16/5388  Respondent: 15506465 / Lisa Garner  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: PSLPS16/5389  Respondent: 15506465 / Lisa Garner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
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<td>I object to the figure of 693 houses per annum in the borough because this is too high (Appendix D) The Plan’s proposed growth is based on the SHMA report which uses a figure that is almost double. It says 693 homes a year are required by the borough but previous plans say 322. The report will not be published so this cannot be verified, which is not acceptable.</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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Attached documents:

Comment ID: PSLPP16/10806  Respondent: 15506497 / James 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): ()

I object to not protecting the Green Belt (Policy P2) Removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) would ruin the area and cannot be allowed. The UK's Green Belt has been supported for years and is critical so close to London.

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

Attached documents:

Comment ID: PSLPP16/10807  Respondent: 15506497 / James Hall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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) All the other Borough Councils in Surrey are at odds with Guildfords proposal and this must be addressed. The plan should also balance development proportionally across the borough, it should not all be focused on Wisley / A3. Clearly, any new development should be in urban areas where there is already sustainable transport. There are more than enough brownfield sites that should be developed for the Plan.

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

Attached documents:

Comment ID: PSLPA16/3051  Respondent: 15506561 / Stuart Harrison  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): ()

Regarding the proposed developments in the Send Green Belt area. The National Planning Policy Framework intended the Gren Belt to be permanent, there are no special circumstances to justify abonding it.

I object to Send Village being removed from the Green Belt. Without the green belt, Woking and Guildford will merge into one large conurbation. This goes directly against a promise that Central Government and Local Councillors gave to protect the Green Belt.

I object to building 400 houses and several thousand square meters of industrial space at Garlich's Arch.

Any industrial development should be an extension to the existing area at Slyfield. Incidentally, the Slyfield Industrial Estate does need another access route.

The Garlich's Arch site is prone to flooding, and is covered in Ancient woodland.

If brownfield site were effectively used this Green belt would not be needed.

I object to the development of 40 houses and 2 travellers pitches at Send Hill.

The single lane road provides insufficient access. Un-safe landfill waste is in the subsoil of this site, and this is registered with Guildford Borough Council.

I object to the building of 45 houses at Clockbarn Nursery. The vehicular infrastructure is totally inadequate for any more traffic.

I object to the proposed new interchange with the A3 at Burnt common.

Send Road cannot, and must not have to deal with increase in traffic that this junction would create. My children go to school at Send First and St Bedes Schools, and the risks of crossing the road outside Send First are already frightening.

I work in Guildford and it can take me 45 minutes to get to work when the A3 has come to a halt. Adding to its use in this area is a preposterous idea.

The whole concept of these developments seem to ignore all the existing issues with congestion, on the roads, getting a school place, booking an appointment at he Dr's etc.

I moved to Send to be AWAY from overcrowded suburbia, and into a Village existance.

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

Attached documents:

Comment ID: PSLPP16/10815  Respondent: 15506561 / Stuart Harrison  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): ()

Once these areas are removed from the green belt there will be no distinction between them and eventually where does that end?! We lose our beloved countryside and eventually become a generic town like any other.

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

Attached documents:

Comment ID: PSLPP16/10814  Respondent: 15506561 / Stuart Harrison  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): ()

policing. I object to the new sites because with so many new properties being proposed, can the local police force deal with the rising work load they may receive.

In conclusion I object to the proposed plans for the areas of Ripley, send and clandon as the areas just do not have the adequate infrastructure to deal with such a large number of new properties, and the families that come with it. There isn't enough schools in the area forcing any new children to the area to look further afield. Which will only add to the traffic problems in the morning. The local villages don't have the facilities to cater for all the new homes. So any families moving to the area have to travel by car to the supermarkets etc and the village roads can not handle the rise in car traffic.

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

Attached documents:

Comment ID: PSLPP16/10813  Respondent: 15506561 / Stuart Harrison  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): ()
infrastructure. I object to the developments for new sites within the green belt, for example the garlick arch site. As the infrastructure in Ripley village in not adequate to accommodate such a large number of new residents. At rush hour times trying to get through Ripley is bad enough. With queues backing up to the m25 in the evenings. Trying to join the a3 or come off the a3 will become far harder if there is so many new homes being built.

The parking is currently lacking in Ripley as already a small village and high street. With 400 new houses proposed at the garlick arch site, there could be potentially 800+ cars. As most households would have two vehicles. The local areas can not cater for this influx of vehicles. There is not enough parking in Ripley and send for this.

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| Comment ID: PSLPS16/5392  Respondent: 15506625 / Ian Toft  Agent: |

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Attached documents:

Comment ID: PSLPS16/5393  Respondent: 15506625 / Ian Toft  Agent:

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

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Comment ID: PSLPS16/5394  Respondent: 15506625 / Ian Toft  Agent:

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

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Comment ID: PSLPP16/10829  Respondent: 15506625 / Ian Toft  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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

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Comment ID: PSLPP16/10826  Respondent: 15506625 / Ian Toft  Agent:

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

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Attached documents:

Comment ID: PSLPA16/2618  Respondent: 15506657 / Teresa Laroche  Agent:

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

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Attached documents:

Comment ID: PSLPS16/5403  Respondent: 15506657 / Teresa 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 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: PSLPS16/5404  Respondent: 15506657 / Teresa 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 Green Belt

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

Attached documents:

Comment ID: PSLPS16/5405  Respondent: 15506657 / Teresa 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 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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<tr>
<th>Comment ID: PSLPS16/5406</th>
<th>Respondent: 15506657 / Teresa Laroche</th>
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<td><strong>Document:</strong> 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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</table>

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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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
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: PSLPS16/5408  Respondent: 15506657 / Teresa 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 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: PSLPP16/10868  Respondent: 15506657 / Teresa 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 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: PSLPP16/10872  Respondent: 15506657 / Teresa Laroche  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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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
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</table>

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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<th>Comment ID: PSLPP16/10866</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

I 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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2613</th>
<th>Respondent: 15506785 / Maverick Hornblow</th>
<th>Agent:</th>
</tr>
</thead>
</table>

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

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

I object to -

[...]

7) lack of immediate provision needed for new schools

8) lack of any immediate provision for doctors surgery

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

Attached documents:

Comment ID: PSLPA16/2614  Respondent: 15506785 / Maverick Hornblow  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 objects to

lack of evidence for housing numbers needed

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

Attached documents:

Comment ID: PSLPS16/5401  Respondent: 15506785 / Maverick Hornblow  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 at garlic arch

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

Attached documents:

Comment ID: PSLPP16/10855  Respondent: 15506785 / Maverick Hornblow  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

increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback
dangerous size vehicals manoeuvring in roads that has little or no pedestrian path way due to increased traffic
lack of parking in the village for the present day users let alone if more were to be housed

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

Attached documents:

Comment ID: PSLPP16/10854  Respondent: 15506785 / Maverick Hornblow  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 use of countryside areas for which the area is so well know to build more properties

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

Attached documents:
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<th>Respondent:  15506785 / Maverick Hornblow</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<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>
<td><strong>I object to</strong></td>
</tr>
<tr>
<td>all erosion of green belt</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>removal of villages from the green belt</td>
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<td><strong>Attached documents:</strong></td>
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<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</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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<tr>
<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>
<td><strong>I object to</strong></td>
</tr>
<tr>
<td>disproportionate amount of development in one area of the borough</td>
<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 object to
limited consultation period
last minute inclusion of new sites with less than 2 weeks 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: PSLPA16/2616  **Respondent:** 15506817 / Reno Hornblow  **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):** ()

[...]

7) lack of immediate provision needed for new schools
8) lack of any immediate provision for doctors surgery S

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

Attached documents:

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Comment ID: PSLPA16/2615  **Respondent:** 15506817 / Reno Hornblow  **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 objects to
lack of evidence for housing numbers needed

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<th>Comment ID: PSLPS16/5402</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to development at garlic arch</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</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>increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback</td>
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<tr>
<td>dangerous size vehicals manoeuvring in roads that has little or no pedestrian path way due to increased traffic</td>
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<tr>
<td>lack of parking in the village for the present day users let alone if more were to be housed</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</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 use of countryside areas for which the area is so well know to build more properties

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

Attached documents:

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Comment ID: PSLPP16/10858  Respondent: 15506817 / Reno Hornblow  Agent:

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

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

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

I object to
all erosion of green belt
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: PSLPP16/10859  Respondent: 15506817 / Reno Hornblow  Agent:

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

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

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

I object to
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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<th>Comment ID: PSLPP16/18617</th>
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I [redacted] objects to -

1) all erosion of green belt
2) removal of villages from the green belt
3) disproportionate amount of development in one area of the borough
4) limited consultation period
5) last minute inclusion of new sites with less than 2 weeks to go
6) lack of evidence for housing numbers needed
7) lack of immediate provision needed for new schools
8) lack of any immediate provision for doctors surgery S
9) and development at garlic arch
10) increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and
11) dangerous size vehicals manoeuvring in roads that has little or no pedestrian path way due to increased traffic
12) lack of parking in the village for the present day users let alone if more were to be housed
13) the use of countryside areas for which the area is so well know to build more properties

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

Attached documents:

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix 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
limited consultation period
last minute inclusion of new sites with less than 2 weeks to go

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

**Attached documents:**

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<table>
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<th>Respondent: 15506881 / Chloe Brown</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT to 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?**
Comment ID: PSLPS16/5433  Respondent: 15506881 / Chloe 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): ()

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: PSLPS16/5435  Respondent: 15506881 / Chloe 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 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: PSLPS16/5437  Respondent: 15506881 / Chloe Brown  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: PSLPS16/5438  Respondent: 15506881 / Chloe Brown  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: PSLPS16/5439  Respondent: 15506881 / Chloe Brown  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:** PSLPP16/10877  **Respondent:** 15506881 / Chloe 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 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:** PSLPP16/10878  **Respondent:** 15506881 / Chloe 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) 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:** PSLPP16/10875  **Respondent:** 15506881 / Chloe Brown  **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?**
Comment ID: PSLPP16/10876  Respondent: 15506881 / Chloe 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 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: PSLPA16/2620  Respondent: 15506913 / Nicholas Mann  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: PSLPS16/5448  Respondent: 15506913 / Nicholas Mann  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? ( )
**Comment ID:** PSLPS16/5449  **Respondent:** 15506913 / Nicholas Mann  **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 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:** PSLPS16/5450  **Respondent:** 15506913 / Nicholas Mann  **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.
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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?

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

Attached documents:

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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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: PSLPP16/10886  Respondent: 15506945 / Catherine Wyatt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/10887  Respondent: 15506945 / Catherine Wyatt  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:
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: PSLPP16/10885  Respondent: 15506945 / Catherine Wyatt  Agent:

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

Do you consider this section of the document; complies with 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: PSLPA16/2622  Respondent: 15507105 / N. Hookins  Agent:

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

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

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

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/5478  Respondent: 15507105 / N. Hookins  Agent:

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

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

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

I OBJECT to Policy A25 Gosden Hill as being totally 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: PSLPS16/5480  Respondent: 15507105 / N. Hookins  Agent:

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

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

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: PSLPS16/5481  Respondent: 15507105 / N. Hookins  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Comment ID: PSLPS16/5507   Respondent: 15507457 / Andre Rose   Agent:

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

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Comment ID: PSLPP16/10898   Respondent: 15507457 / Andre Rose   Agent:

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

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

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

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Comment ID: PSLPP16/10903  Respondent: 15507489 / K Garner  Agent:

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

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Comment ID: PSLPP16/10904  Respondent: 15507489 / K Garner  Agent:

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

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Attached documents:

Comment ID: PSLPA16/2634  Respondent: 15507553 / David Lawton Garner  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 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: PSLPA16/2633  Respondent: 15507553 / David Lawton Garner  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, 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?

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Comment ID: PSLPS16/5523  Respondent: 15507553 / David Lawton Garner  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 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.

---

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
- 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 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 there for decades employing local people and are therefore clearly sustainable.

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

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Comment ID: PSLPS16/5526  Respondent: 15507553 / David Lawton Garner  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): ()

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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Comment ID: PSLPP16/10935  Respondent: 15507553 / David Lawton Garner  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): ()

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: PSLPP16/10932  Respondent: 15507553 / David Lawton Garner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

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

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

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

Attached documents:

Comment ID: PSLPP16/10937  Respondent: 15507553 / David Lawton Garner  Agent:

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

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?

Attached documents:

Comment ID: PSLPP16/10938  Respondent: 15507553 / David Lawton Garner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

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:  PSLPP16/10936  Respondent:  15507553 / David Lawton Garner  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:  PSLPP16/10931  Respondent:  15507553 / David Lawton Garner  Agent:

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

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

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

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

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

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

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

Attached documents:
Comment ID: PSLPP16/10933  Respondent: 15507553 / David Lawton Garner  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: PSLPP16/10930  Respondent: 15507553 / David Lawton Garner  Agent:

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

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

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

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

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities 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.

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.

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<td><strong>I object to the Borough Wide Strategy (Policy S2)</strong></td>
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<tr>
<td>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.</td>
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<tr>
<td>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.</td>
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<td>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.</td>
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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?

Attached documents:

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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.

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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

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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:**

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**Comment ID:** PSLPP16/10951  **Respondent:** 15507585 / Patrick Laroche  **Agent:**

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

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:** PSLPP16/10948  **Respondent:** 15507585 / Patrick Laroche  **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?**

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<th>Comment ID: PSLPP16/10949</th>
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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

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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 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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| Comment ID: PSLPS16/5541 | Respondent: 15507617 / Ewan Collens | Agent: |
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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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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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:** PSLPP16/10970  **Respondent:** 15507617 / Ewan Collens  **Agent:**

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

Do you consider this section of the document; complies with 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:** PSLPS16/5545  **Respondent:** 15507649 / Nick Turner  **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

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be
highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will 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.

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.

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

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

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

Attached documents:

Comment ID: PSLPS16/5546  Respondent: 15507649 / Nick Turner  Agent:

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

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

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

I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm 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, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to FlexfordFarm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which
includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested EgertonRoad/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

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 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 Wisley. I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee unanimously rejected a recent planning application for precisely this development on 14 separate grounds. However, the site had been reinserted into the new draft local plan published only 24 hours before the planning decision. There is no need for housing on this site because the local plan housing target is incorrect &inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

Green Belt location and absence of “exceptional circumstances”.

Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).

Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

Absence of adequate traffic data.

Loss of high-quality agricultural land (55% of the site), in breach of national policy.

Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.

Presence of a Surrey County Council safeguarded waste site.

Cost of infrastructure required to the detriment of alternative more favourable sites.

Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.

Impact on listed buildings.

Extreme housing density with tiny garden spaces.

Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19

Failure to evaluate the cumulative impact of this and nearby development sites on the area.

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

Attached documents:

Comment ID: PSLPS16/5548   Respondent: 15507649 / Nick Turner   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 A42 Clockbarn Nursery. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5549  Respondent: 15507649 / Nick Turner  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 Garlick’s Arch. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

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

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

I object to the 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. There is a 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 Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

I object to the proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need for a Strategic Employment Site in this location when there is ample space available at Slyfield (40 ha) and the Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013. I object to the loss of rural employment on the site as the development would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

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

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road &
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 Send and 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 Send and Ripley, the roads serving the village will become even more congested. Particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

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

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

I object on the grounds of 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. The A3 & M25 are already at capacity during peak hours and development prior to improvement of these roads will make the situations worse.

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

Attached documents:

Comment ID: PSLPS16/5550  Respondent: 15507649 / Nick Turner  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
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 Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

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: PSLPS16/5551  Respondent: 15507649 / Nick Turner  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 Send Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

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 the water table and increase risk of flooding to surrounding properties.

The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons. There is a danger that any disturbance would be health hazard due to the unknown materials, and GBC has installed gas monitoring wells on site since July 2000. Methane gas discharge has been recorded making the development of this site a health hazard.

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

Attached documents:

Comment ID: PSLPP16/10973  Respondent: 15507649 / Nick Turner  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): ()

The Green Belt and Countryside Study does not look strategically at options for development in major settlements beyond. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Exceptional circumstances do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. 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 or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. 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 is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

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 surface water 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.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. It would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. 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 government policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

The extent to which the 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 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 Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young 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.”

Notwithstanding that the Sustainability Appraisal should be proportionate, 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.

I object to all Green Belt sites allocated for development in the local plan.
I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. 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: PSLPA16/2659  Respondent: 15507713 / Yvonne Connolly  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: PSLPS16/5636  Respondent: 15507713 / Yvonne Connolly  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: PSLPS16/5611  Respondent: 15507713 / Yvonne Connolly  Agent:

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

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.
Do you consider this section of the document; complies with 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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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.

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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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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: PSLPP16/11023  Respondent: 15507713 / Yvonne Connolly  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: PSLPP16/10974  Respondent: 15507713 / Yvonne Connolly  Agent:

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

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

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

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

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

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Comment ID: PSLPS16/5560  Respondent: 15507841 / Mark Fenner  Agent:

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

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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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:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

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

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

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

Attached documents:

Comment ID: PSLPA16/2663    Respondent: 15507873 / Andy Tupper    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: PSLPS16/5630    Respondent: 15507873 / Andy Tupper    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.

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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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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

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Attached documents:
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Attached documents:

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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Attached documents:

I OBJECT to Policy A57

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Attached documents:

Comment ID: PSLPP16/11010  Respondent: 15507873 / Andy Tupper  Agent:

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

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Attached documents:

Comment ID: PSLPP16/11028  Respondent: 15507873 / Andy Tupper  Agent:

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

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Attached documents:

Comment ID: PSLPP16/10979  Respondent: 15507873 / Andy Tupper  Agent:

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

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Attached documents:

Comment ID: PSLPA16/2664  Respondent: 15507905 / Hannah Lewis  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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Attached documents:

Comment ID: PSLPS16/5629  Respondent: 15507905 / Hannah Lewis  Agent: 

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

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Attached documents:

Comment ID: PSLPS16/5617  Respondent: 15507905 / Hannah Lewis  Agent: 

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Attached documents:

Comment ID: PSLPS16/5598  Respondent: 15507905 / Hannah Lewis  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: PSLPS16/5587  Respondent: 15507905 / Hannah Lewis  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?

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Comment ID: PSLPP16/11009  Respondent: 15507905 / Hannah Lewis  Agent:
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Attached documents:

Comment ID: PSLPS16/5571  Respondent: 15507969 / Ian Draper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Comment ID: PSLPS16/5597  Respondent: 15507969 / Ian Draper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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Comment ID: PSLPS16/5596  
**Respondent:** 15508001 / Lisa Barwick  
**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?

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Comment ID: PSLPS16/5589  
**Respondent:** 15508001 / Lisa Barwick  
**Agent:**

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

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Comment ID: PSLPP16/11006  
**Respondent:** 15508001 / Lisa Barwick  
**Agent:**

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

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Comment ID: PSLPS16/5627  Respondent: 15508033 / D Worship  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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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.

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Comment ID: PSLPS16/5620  Respondent: 15508033 / D Worship  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): ()

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

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Comment ID: PSLPS16/5566  Respondent: 15508033 / D Worship  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
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Comment ID: PSLPS16/5591  Respondent: 15508033 / D Worship  Agent:

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

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Comment ID: PSLPP16/11004  Respondent: 15508033 / D Worship  Agent:

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

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Comment ID: PSLPP16/11032  Respondent: 15508033 / D Worship  Agent:

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

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Comment ID: PSLPP16/10991  Respondent: 15508033  D Worship  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Attached documents:

Comment ID: PSLPA16/2668  Respondent: 15508065  Christina Worship  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPS16/5626  Respondent: 15508065  Christina Worship  Agent:
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Attached documents:

Comment ID: PSLPS16/5568   Respondent: 15508065 / Christina Worship  Agent:

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

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Comment ID: PSLPS16/5594   Respondent: 15508065 / Christina Worship  Agent:

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Comment ID: PSLPP16/10997  Respondent: 15508065 / Christina Worship  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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Attached documents:

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Comment ID: PSLPA16/2650  Respondent: 15508225 / John Allan  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 in the strongest possible terms to your proposal to increase the number of houses in the villages of West and East Horsley by about 500.

My reasons for objecting are firstly the local infrastructure is already severely overloaded and more importantly there is no land other than Green Belt available.

Should this plan go ahead the pleasant village life experienced in these two villages will be carelessly wasted all for what will at be at best a brief respite from further creeping urbanisation.

For the above reasons I urge you to reconsider your Local Plan proposals and resubmit them to better reflect the wishes of your local constituents.

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

Attached documents:

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Comment ID: PSLPS16/5563  Respondent: 15508257 / Andrew Whitehall  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 with regards to the above proposal build 1100 homes, a Secondary school & six travelling show pitches on GREEN BELT LAND! I have read the proposal & knowing the site(s) well, having lived in the village for most of my life and a child played in the proposed fields, I wish to **strongly object** due to the attributing factors listed below -

- Disproportionate & unsustainable development, on Green Belt land.
- Erosion of green belt land when there are brownfield sites, elsewhere in Guildford, far better suited with all the amenities already on their doorstep.
- Destruction of rural environment where currently protected brown snakes, deer & other wildlife live, 500 year old oak trees & open fields will just become a concrete mass, building houses on this type of land is not the way forward.
- The Council are ignoring the advice of previous planning inspectors that the fields of Normandy add to the openness of the green belt.
- As for the claims that a Secondary School is a necessity & “trumps” planning policy on greenbelt is simply untrue as there is no legal evidence to support this, as there are numerous Secondary Schools in our area all of who are undersubscribed.
- Glaziers Lane & Westwood Lane are country lanes and are not remotely suitable for the vast increase of traffic that would ensue from building these houses. The houses would actually be boxed in by road & rail, congestion on the roads in Normandy is already a major issue with multiple delays & accidents not to mention the pollution.
- People actually move to Normandy for the open fields & try to give their families a safe and rural life, fully aware there are not schools and large housing estates.
- Who is going to pay for the extra emergency services required to service this out of town area as this proposal would double the size of our village?

We have all been blessed with nature on our doorsteps, embrace it & protect it as it is so precious, if you agree for this to be all ripped away it will never, ever be replaced.

Surrey County Council has always prided itself on being one of the forerunners of providing green, open land for people to walk, ride & play in, don’t now destroy this legacy.

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

**Attached documents:**

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I OBJECT most strongly to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford & Walden Cottages as these areas were identified, by the Council, as contributing to the “openness of the Green Belt”, so these areas should remain washed over by the Green Belt status. Please see below my further points as to why I object.

- I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.
- I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.
- I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:
  - There is evidence in past planning appeals APP/Y3615/W/3002308, APP/Y3615/A/102140360 and APP/Y3615/A/10/2131590 that the land here contributes to the "openness" of the Green belt
  - There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits 'openness' and contributes to the rural economy
  - The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog's Back)
- Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.
- 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.
- 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 setting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.
- I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that 14 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.
- I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.
- I am concerned that settlement boundaries are to be hugely extended in many villages (including Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

I SUPPORT – Removal of site A46 & removal of site A47

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5574</th>
<th>Respondent: 15508321 / Anne Tyson</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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</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 removal of the former Wisley Airfield from the Green Belt which serves a vital role in the prevention of London sprawl.

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

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

The potential harmful impact on transport, local roads and road safety by this suggested development. The result of an additional 2,000 homes could result in an estimated 4,000 more cars, plus other vehicles to service the development.

Such increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham.

The absence of cycle paths and footpaths renders the assertion that the development would result in a shift to using cycles and walking is not viable.

There would be an increase in the existing severe congestion on the Strategic Road Network of the A3 and M25. Also any proposed secondary school would add to this congestion.

There is not sufficient capacity at all the local railway stations to accommodate further large increase in passenger traffic and parking facilities.

Air quality issue does not seem to be given sufficient consideration; near the M25/A3 junction, it already exceeds EU-permitted levels.

These and other objections are supported by the unanimous rejection of application 15/P00012 by the Planning Committee at Guildford Borough Council on 8th April 2016.

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

Attached documents:
I object to site A43, the proposal for the development of Garlick’s Arch.  
I object to the late inclusion of site 43.  

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: PSLPS16/5592</th>
<th>Respondent: 15508353 / James Hawkey</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to site 43a. This will increase traffic problems in 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: PSLPP16/11040</th>
<th>Respondent: 15508353 / James Hawkey</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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<th>Comment ID: PSLPP16/11041</th>
<th>Respondent: 15508353 / James Hawkey</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? ( )
I object to the limited consultation period

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

Attached documents:

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Comment ID: PSLPA16/2652  Respondent: 15508385 / Susan Woodman  Agent:

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

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

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

The existing slip road is to become a two way road which will put far more traffic into Burpham that it just cannot take.

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

Attached documents:

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Comment ID: PSLPA16/2653  Respondent: 15508385 / Susan Woodman  Agent:

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

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

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

I can find no evidence for the alleged housing need numbers of 693 a year which is more than double the previous figure of 322 in 2012. Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

Brownfield opportunities are being ignored. We need homes in the centre, more accommodation on campus for students, and homes for the elderly would free up family houses.

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

Attached documents:
The loss of Green Belt land, more specifically the proposed Green Belt development at Gosden Hill. I oppose unjustified Green Belt development. Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.

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

Attached documents:

There is a lack of specific details of essential infrastructure.

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

Attached documents:
It is irresponsible to squander every last resort greenfield site in a single Plan, robbing our future generations.

There is a disproportionate level of development in one area of the Borough.

Expansion should be constrained to protect the character of town and country in our congested gap town.

The consultation period is limited in time. I believe the Local Plan should be presented properly at public consultations and the feedback taken on board because I don’t see that it has been to date.

Tunnelling of the A3 should be agreed before Gosden Hill is planned for development.

Transport evidence is not yet fit for use and major transport issues are unresolved e.g. another river crossing, a central bus facility.

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

Attached documents:

Comment ID: pslp172/4248  Respondent: 15508385 / Susan Woodman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

I don’t believe you have addressed the objections raised previously. I also believe the Draft Local Plan is still unsound and unsustainable.

2,000 new homes on Gosden Hill will be a huge mistake. The infrastructure simply is not there and Burpham cannot take any more traffic. The roads are already blocked every day, the pollution is in excess of permissible levels and will only get worse. The thousands of vehicles that will be generated will mostly travel through Burpham and is dangerous for pedestrians and for all our health. You recently allowed the Aldi application who have since then broken every planning restriction originally passed and now the many large lorries are numerous, dangerous and heavily polluting.

You cannot take our Green Belt away. Housing in Gosden Hill is in our Green Belt and with such plans you are eventually going to join Guildford up with Woking and/or Clandon. You need to safeguard our countryside from encroachment, from merging into other towns and preserve the character of Burpham.

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

Attached documents:

Comment ID: pslp171/2554  Respondent: 15508385 / Susan Woodman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
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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>You should be looking at rerouting the A3 around Guildford, even in a tunnel under Guildford. Three lanes into two lanes as currently through Guildford causes gridlock most days and when there is an accident all that traffic goes through Burpham. That is just crazy and dangerous and seriously harms our health.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>You are trying to build far too many houses in Guildford. I know more housing is needed but they need to be of the right type with affordable ones for first time buyers. Where do your figures come from? We do not need nearly 14,000 new homes in Guildford.</td>
<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: PSLPA16/2655  
**Respondent:** 15508961 / Abby 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): ()

I object to the extension of the boundaries of the settlement areas of the Horsleys - no sound reasons have been given for this proposal.

I strongly object to the proposal to develop Green Belt land for housing, particularly sites A37, A38, A39, A40 and A41. All of which play an important part in the character of the Horsleys, in terms of the green and leafy environment. The requirement for this many new houses in the Horsleys has not been demonstrated.

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

**Attached documents:**

### Comment ID: PSLPS16/5607  
**Respondent:** 15508961 / Abby Allen  
**Agent:**

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

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

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

I object to the development of Wisley Airfield as this site is mostly Green Belt with a very small section of brownfield land.

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

**Attached documents:**

### Comment ID: PSLPP16/11059  
**Respondent:** 15508961 / Abby Allen  
**Agent:**

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

### Page 627 of 1920
Do you consider this section of the 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 that the infrastructure in the Horsleys (schools, medical centres, roads, car parks) are already overstretched and will not be able to handle the 500+ houses proposed for the Horsleys.

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

Attached documents:

Comment ID: PSLPP16/11057  Respondent: 15508961 / Abby Allen  Agent:

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

Do you consider this section of the document; complies with 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 Horsleys (East and West) 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:

Comment ID: PSLPP16/11058  Respondent: 15508961 / Abby Allen  Agent:

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

Do you consider this section of the 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 that the proposed increase in households in the Horsleys is 35% which is greater than any other area in the Borough.

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

Attached documents:

Comment ID: pslp172/3880  Respondent: 15508961 / Abby Allen  Agent:
1. The continued inclusion of the Wisley airfield as a site for housing. This is an inappropriate location due to many reasons including transport links, infrastructure (such as schools, doctors etc) environmental protection and its impact on the surrounding villages.

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

Attached documents:

Comment ID: PSLPA16/2656  Respondent: 15508993 / Alice Norman  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): ()

Transport

A realistic traffic solution must be put in place before any agreement is made on housing - Particularly the decision regarding the A3 tunnel.

The proposals for the infrastructure for transport are insufficient and inappropriate – there is not enough space for the suggestions of bus lanes and cycle lanes on both sides of London Road in Burpham – it does not have the capacity for the current levels of traffic - the traffic is solid along the London Road and peak times and school start and end times already. So the impact on the environment will be worse not better with even more vehicles stationary while they move through Burpham.

After the building of Aldi in Burpham there is undeniable proof that the methods of calculation used by GBC and SCC to predict traffic movements are seriously flawed and incorrect – there is much congestion around the A3100/A2234 roundabout due solely to Aldi customers.

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

Attached documents:

Comment ID: PSLPP16/11065  Respondent: 15508993 / Alice Norman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5635</th>
<th>Respondent: 15509057 / Richard Golding</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>

I OBJECT, this additional junction on the A3 is within 2.5 miles of an existing junction. Junctions increase the risk of accidents with drivers leaving it late to get in the correct lane to leave a fast road, where as traffic joining effectively reduce the principal road by one lane. It will not improve the traffic flow on the local roads, it could even make it worse, as it could draw traffic from the south and southwest of Woking on to the A247 through Send to join the A3, where as they may use the Byfleet road to the A3 junction at Pains Hill This proposal is only there so the council can claim to be doing road infrastructure work to assist with traffic flows that all these proposed development will produce.

**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: PSLPS16/5637</th>
<th>Respondent: 15509057 / Richard Golding</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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</table>

I OBJECT, this additional junction on the A3 is within 2.5 miles of an existing junction. Junctions increase the risk of accidents with drivers leaving it late to get in the correct lane to leave a fast road, where as traffic joining effectively reduce the principal road by one lane. It will not improve the traffic flow on the local roads, it could even make it worse, as it could draw traffic from the south and southwest of Woking on to the A247 through Send to join the A3, where as they may use the Byfleet road to the A3 junction at Pains Hill This proposal is only there so the council can claim to be doing road infrastructure work to assist with traffic flows that all these proposed development will produce.

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

**Attached documents:**
I OBJECT, This area may have started off as a quarry but it became a landfill site prior to the EU Landfill Directive with type of waste not identified. 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. This area is also shown on a number of Ordnance Survey Maps as refuse tip. The Envirosurvey 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’ it would be far better to leave the site undisturbed. Any development of the site would add an extra 80 cars on the roads of Send producing addition congestion.

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

Attached documents:

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I OBJECT. Sustainability should not be confined to just the building it should also apply to access to the buildings and with public transport slowly being reduced these settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. Build dormitory towns across the Green Belt that are environmentally and socially unsustainable are totally unacceptable. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally. And developers will have no interest in installing these because it will affect their bottom line.

---
I OBJECT. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11087  Respondent: 15509057 / Richard Golding  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. This policy that does not address any of the obvious practical issues already touched on but it is essential, that a reasonable amount of affordable housing is available for purchase but it also essential that there should property that are affordable for rent. Yet recently when any development has taken place in Send affordable is the last thing on the developers mind. Tice the builder, house and yard was recently redeveloped with four-bed room houses. A police house was redeveloped, Skene Close was the result with six houses selling for between £630 to 690,000, and a plot in Send...
Marsh, which was two houses away from some cottages, had a detached house built which sold for £1005000. The site could have accommodation two pairs of semi-detached cottages, which would have stood some chance of being affordable.

Low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors.

The number of homes planned in the urban area is too low. There is a glaring need for regeneration in Guildford and not retail or office space, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline. All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/11080  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale. Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan.

Policy E5 is incompatible with the high housing numbers proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/11081  Respondent: 15509057 / Richard Golding  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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11082  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment. There should be much more residential uses of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. But all the council thinks of is more retail development surely the dinosaurs in the planning department must have realized that shopping is moving on line, and if any more retail space is provided it will have a very negative effect on the traditional shopping area like the High Street. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Yet the local plan totally ignores the Council own plan for the Town centre, the redevelopment of the railway station and the Vision group proposal for a new rail river crossing. It also ignores the NPPF requirements to provide guidance on design requirements.

The plan only seems to be interest in increasing the shopping area even thought this requirement in a town is in decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11083  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is absolutely crazy. Shops in existing villages are closing and being converted into residential property. So there must be another reason; it could well be to let build shops, then we have a good reason to build a lot more houses. This nothing more than creeping urbanisation. One of the reasons the Green Belt policy was established after the second world war. This is another Trojan horse policy, allowing retail hubs to be established and expanded in order to smooth the way for vast new housing estates outside in the countryside, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems large housing developments will bring. The Council has no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand. The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11084  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London. In Send since the turn of the century four shops have gone from the village; Chemist, shoe shop and an electrical contractor supplier, these have been demolished and replaced by offices and residential, where the local post office and general provision store has been converted into residential use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11072  Respondent: 15509057 / Richard Golding  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, this section seems to be a wish list there is no detail on how this is to be rolled out or how or when certain area will be developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11073  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East and in a short journey time to London 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. And when the planning applications are lodge the bulk will be for 4/5 bedroom properties and the planners will not be able to resist this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11074  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough-housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development, which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11089  Respondent: 15509057 / Richard Golding  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 I2 Supporting the D.O.T. “Road Investment Strategy”

I OBJECT. Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean *either* major infrastructure investment that no-one is prepared to pay *or else* a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services. The plan targets greenfield sites – requiring heavy infrastructure investment. Public Transport in the form of buses are being cut, bus operators require a profit or subsidy to run a service and the council s are withdrawing the subsidy so the service is withdrawn. The chance of getting new stations on the rail network is very remote; they cost an out of this world figure and slow the overall service down. The dwell time of modern stock at stations is high due to the time it takes to open and close the doors. Most of the proposed improvements to the major roads will take year’s take Send at the moment the A247 Send Road comes to a standstill during the peak period adding a minimum of 480 houses which will be around 960 cars to the roads will cause grid lock this excludes the the HGV to the industrial units. Most people will use private cars as they are always have a time deficiency and buses are always slow and never there when they should be. Surrey is the most congested county in England with 683, people per square kilometer compared to an average of 413. With massive disruption during construction and a huge increase in the number of cars on the local roads, grid lock awaits?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11090  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 - Sustainable transport for new developments

I OBJECT. This is just a pie in the sky bit of box ticking, if one assumes that households have a minimum of one car but looking around it seems that most have two or more and this will be the normal means of transport. These days people will not wait around for a bus that fails to turn up, we will certainly not have a service like central London with one every 5 minutes, so if one is missing it is not to long to wait for the next. Unless Guildford borough bans the ownership of cars, cars will be the standard method of transport. People will not want to cycle because of the large number of cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11091  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy must be a box ticking exercise, it totally ignores the fact that the local plan is just a policy to concrete over large area of agricultural land, with global warming happening this land will be required for food production.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11075  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. 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: PSLPP16/11076  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; 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 states, “the general extent of the Green Belt has been retained.” This is a lie. There is a major reduction in the plan for Green Belt land between Guildford and the M25. The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away even if central office is whispering in the ears of its councilors as to how great it would be for developers and such an advantage for them.
Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchments
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, opens space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. (All though the government has recently seemed to opted for a back door policy to destroy the green belt) It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No one argues that we should sell 1.6% of the Crown jewels in order to build houses. I am not opposed to appropriate development in the Green Belt in Send, Send Marsh and Ripley. But I fail to see why a system of fair burden sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural Send, Send Marsh or Ripley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted. Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning. I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be extended in many villages including Send, Send Marsh and Ripley and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell-bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councilor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable
development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Send is a good example of villages that ought to retain their Green Belt status. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

I OBJECT to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

1. The land behind the schools including playing fields and woodland.
2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11092  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the way this local plan totally disregards the protection the Green Belt gives to field and open spaces, it is cynical the way the council wish to create urban sprawl along the A3, (Policy A35, A43 and A25) this was one of the founding reason for creating the Green Belt in the first place, to stop urban sprawl along trunk roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11077  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets some owned by Guildford borough and Surrey County Council. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages, which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. Sprawl from towns that occurred between the two wars was one of the main reason for establishing the Green Belt. Apart from being a scandalous misuse of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11078  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Urban development on existing hard standing would not create additional flood risk, but the extent of existing hard standing would. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside If the avoidance of flooding was designed in to the structures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11079  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Green space) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11069  Respondent: 15509057 / Richard Golding  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 Presumption in favour of Sustainable Development.

I object, the proposals in this policy have totally ignored the most SUSTAINABLE item we have been given, THE GREEN BELT, the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The contempt for Green Belt constraints was amply demonstrated by counselor Spooner at the open meeting in Send when he said its only green belt not an Area of Outstanding Natural Beauty when a query was raised by one of the members of the public present.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s is just a developers charter and one can be sure that any development will be heavily biased towards large properties 4/5 bedrooms as has been shown by the small amount of redevelopment which has already occurred in Send. This develops at all cost. With the references to sustainability being so vague that the NPPF the presumption in favour of sustainable development becomes a presumption in favour of any development at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11070  Respondent: 15509057 / Richard Golding  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposals to build 13,860 new homes the bulk of these on the green belt.

The number is based on pre-Brexit projections for economic and population growth, including migration. There is all ready softening of the housing market with Property Company shares falling these numbers now need to be revised downwards, possibly quite seriously.

The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work in London a short commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; Where as half the people who work in Guildford live outside the borough. This so called HMA nothing more than a bit of fiction dreamt up by the planners as a way to try and concrete over a large area of green belt. The HMA for an area that is part of the London commuter belt fails to follow that of a self contained town such Exeter, Taunton etc.

Guildford is part of a far wider and more complex housing market. These concerns regards the HMA have been raised before but the council has ignored it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11071  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The need for the 13,860 properties seems to bear no relation ship to the population forecast produced by the Office of National Statistics (ONS) these show the general level of population in Guildford Borough will stay fairly static (births = deaths) with the exception of students, which could well change with Brexit, with these being at the university, surely it would make far more sense to replace the proposed 48,000 m2 of additional retail space with accommodation more suitable for young couples and students, The changes in the retail world with the growth of online shopping has already brought about the demise of a number of stores of the type that would use shopping mails/centers and this will develop even more during the period of this local plan. Additional retail space would be very negative on the traditional shopping areas such as the High Street and North Street.

The university should also be provided student accommodation this would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on require their university to accommodate far more students than Guildford. 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 underused 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. Overprovision is inappropriate given other constraints.

Justin Gardner Consulting Ltd, who produced this HMA have got there figures totally wrong. I would suggest the ONS figures are closer to reality especial with Brexit on the horizon, given that Justins Gardners web site shows they mainly
work for developers, I would suggest what they have produced in short is a developers charter. Or possible they are trying to create a new town called Wokeford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1374  Respondent: 15509057 / Richard Golding  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): ()

GENERAL COMENTS ON LOCAL PLAN

This local plan is just a developer charter; The HMA has effectively been prepared by a Consultant to please developers, with the sole object of providing nice building sites in the remains of the Green Belt for 4/5 bedroom houses. It fails to do anything for young people and totally ignores Guildford Town Centre except looking to add even more unwanted retail space, The figure of the number of homes required have been estimated way above the governments figures as prepared by the Office of National Statistics. This plan should be consigned to the waste bin.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/458  Respondent: 15509057 / Richard Golding  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: this would enable the development to grow which would be totally out of keeping with the rural location, this old no conforming use is located on one of Guildford Borough’s jewels, the Wey Navigation, and any development would be very detrimental to it. Access to the site from the A247 is by a very narrow lane just one vehicle wide far more suitable for a horse and cart than a forty-four-ton HGV. Any development at this point would detract from the openness of the land (GREEN BELT) around the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/3464  Respondent: 15509057 / Richard Golding  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 changes at Clockbarn in Tannery Lane because: There is no need for housing on this site, the local plan housing target is incorrect. The figures quoted way exceed the local need, the local requirements are for social housing and not large executive boxes as favoured by developers to maximize profits. The revised proposal to increase the development by 33% makes a mockery of THE GREEN BELT. The site is part of the permanent GREEN BELT at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. Any development will create URBAN SPRAWL along the Wey Navigation and have a very negative effect on this asset of Guildford Borough. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3469  Respondent: 15509057 / Richard Golding  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 changes at Garlick’s Arch because: This land is GREEN BELT it contains two areas of ancient woodland 50% of the site is subject to flooding and is recognised locally as a FLOOD PLANE (see attached photographs), it carries a flood zone 2 allocation any work carried out to reduce the area flooded would increase the likely hood of flooding in Send Marsh, the Environment Agency undertook work a few years ago in Send Marsh to reduce the risk, but any work on Garlick’s Arch could neutralise the good work done.

If the proposed development of 400 houses and 6 travelling show peoples’ plots were built where will their surface water go, will it just be spirited away, it will certainly not soak into the ground under such a density of buildings.

The proposal for 400 homes totally ignores the thousands of previous objections made by local people, and there is no proven demand for travelling show peoples plots in this location.
The ancient woodland on the site has protection under the NPPF section 118 if one locates a development of this size adjacent to woods it can not fail to damage it. I do realise the policy does allow exception for thing of national importance, but this certainly fails to meet that standard. A UK wide state of nature survey undertaken in 2016 shows worrying trends, so Surrey Wildlife Trust landscape manager Mile Waite undertook a state of nature survey in Surrey and this showed that Surreys flora and fauna appears to be fairing particularly badly with losses far higher than the national level – 12% compared nationally 2%. Of a total of 404 priority species of national conservation concern almost 31% are locally extinct in Surrey while 37% are threatened or in worrying decline leaving 32% considered stable or recovering. The proposed development will not improve the situation it would have a negative effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3474  Respondent: 15509057 / Richard Golding  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 A58 at Burnt Common because: this site was deleted from the 2014 Local Plan due to objections, yet put back into the 2016 Plan, this current proposal looks too increase the development above the 7,000 square meters of warehouse or industrial units proposed in the 2016 Local Plan. There is currently no requirement for more industrial units. Guildford and Slyfield currently have empty sites and there is a decline in the demand for such sites, the 2017 employment land need assessment shows a reduction in demand to 3.9 hectares for the whole borough, yet the council are proposing to destroy 10 hectares of Sends GREEN BELT for unnecessary units, putting even more pressure on the local roads and adding to the development along the A3 corridor totally against the GREEN BELT policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2672  Respondent: 15568033 / Neil Jenkins  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): ()
Objection to new local plan

I object to Send village, Wisley, Clandon and Ripley being removed from the Green Belt. We bought our house in this village to be outside of the hustle and bustle of Guildford or Woking and to bring up our children in a small village environment. This environment will be ruined by these plans.

I object to the number of homes that the plans intend to deliver.

I object to the new 4-way on/off ramp to A3 at Burnt Common (A43a). This will not alleviate traffic in Send, Ripley or Clandon. I believe it will make it worse. And it will enable further development.

I object to the inclusion of Green Belt within the proposed new Village boundaries (which is very likely to lead to more development in the future)

I object to Garlick's Arch proposal (Policy A43) to build 400 houses and 7000 sq. Metres of light industrial warehousing. This is literally on our doorstep and the increased traffic and noise would be unbearable.

I object to the destruction of the Green Belt in this area, including the development of 2,000 homes at Gosden Hill Farm, Merrow (Policy A25) which is in clear contravention of the central Government's stated commitment to Green Belt protection.

I object to the last minute inclusion of new sites with less than 2 weeks notice. Due process has not been followed.

I object to the limited consultation period which doesn't give residents enough chance to digest everything and the impact this will have on their lives.

I object to policy A44 involving 1.9 ha of land to be designate for 40 homes and 2 travellers' pitches. This is new and was not included in the regulation 18 draft, and has not be consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt Status.

The Green Belt was intended to be permanent, as required by 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.

If we had wanted to live in an urban environment we would have bought a house in Guildford or Woking. We bought into the beautiful countryside on our doorstep. These plans will be devastating for the villages of Send, Clandon and Ripley and I wholeheartedly object to them.

I would like my comments to be given 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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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
We object to the new local plan which will destroy extensive AONB by invading greenfield sites.

In particular we have doubts about the sustainability of the proposed development off the Hogs Back at Blackwell Farm.

This would destroy views from the Hogs Back ridge, Remove 72 hectares of scenic farmland and ancient woodland, Add 1800 houses, an Industrial Park, traveller's pitches, and a new highway, Increase traffic congestion along the A31, A3, and the B3000 through Compton village, And add to Guildford's pollution.

Don't let this happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1921  Respondent: 15568065 / Colin and Susan Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council's changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review [para. 4.3.8].
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion - particularly around the hospital and A&E - and will also encourage rat-running through residential areas such as Compton village.
- 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]. Accessing the A31 from the top end of Down lane will become impossible.
- adds to air pollution in neighbouring areas, which already exceeds 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: pslp171/582  Respondent: 15568065 / Colin and Susan Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

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 changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review [para. 4.3.8].

- directs more office space to an extended business park [Policy E4], which will increase peak time congestion - particularly around the hospital and A&E - and will also encourage rat-running through residential areas such as Compton village.

- 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]. Accessing the A31 from the top end of Down lane will become impossible.

- adds to air pollution in neighbouring areas, which already exceeds 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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Re. Paragraph 4.3.16 and Proposals Map Settlement Boundary Changes in East Horsley.

I OBJECT to the proposed boundary change to move the settlement boundary westwards from the houses on the west side of Kingston Avenue to the tree line running along the parish boundary on the west edge of of Kingston Meadows which would result in taking all of Kingston Meadows out of the green belt.

I have lived in my house since October 1979 and daily walked in the Meadows with my dogs. When GBC bought the Meadows, renaming them Kingston Meadows, we were assured by GBC that they would forever be used as recreation area for the residents of East Horsley. A large circle of Whitebeam trees was planted at the far (south) end of the Meadows and we were told the land there was to be used by locals to freely roam, picnic, exercise, walk children and dogs etc. Subsequently the children's play areas, tennis courts, football pitch and so on were built, all plainly for use by villagers.

No sound reasons have been given for the proposed extension of the boundary, which seems to be aimed solely at increasing the land available within the settlements for future additional development. Moving the green belt boundary westwards does not constitute an 'exceptional circumstance' under the NPPF rules and as such I believe this to be an invalid proposal.

Therefore I OBJECT TO THIS PROPOSED BOUNDARY CHANGE.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2674  Respondent: 15568161 / Andrew Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to notify my concerns regarding the Guildford Local Plan (the Plan) and specifically the development as outlined in East & West Horsley where it would appear that the proposal incorporates nearly 600 new houses to be constructed within a five year period of the adoption of the Plan.

Whilst I appreciate the need to provide additional housing stock it is imperative that any development of this magnitude considers commensurate attention and improvements to the hinterland’s basic infrastructure. I am not convinced that this infrastructure improvement is adequately demonstrated or supported within the Plan.

My major concerns include;

1. There is a proposal to remove East & West Horsley from the Green Belt. My understanding is that this drastic action should only be contemplated in “exceptional circumstances”. I do not believe that these “exceptional circumstances” have been adequately demonstrated.
2. There appears to be a proposal to extend the boundaries of the Settlement areas of East & West Horsley. It is not clear to me why these changes are proposed with no persuasive reasons or evidence to support the proposal. I am advised that the sole purpose of this extension appears to be aimed at increasing the land available within the settlements for future additional, but as yet unspecified, development. This is a serious concern.
3. I have previously mentioned my concerns regarding the additional burden the Plan’s proposals would place on the existing infrastructure. There is already inadequate car parking at both Horsley and Effingham Junction railway stations each of which cater for very heavy commuter traffic. Local schools appear to be more or less at capacity. The medical services are clearly stretched at present and obtaining appointments with doctors is difficult with long waiting times as routine. Drainage and water supply pipework appears overloaded and inadequate with frequent bursting of pipes and overflowing of drains in winter. The road surfaces are poor, potholed and in need of regular repair. The Drift, a very popular and busy cut through from West to East Horsley, is a prime example. There appears to be little or no scope or interest in improvement and certainly nothing that I have seen in the Plan which offers any comfort here.
4. I notice that Station Parade is designated as a “District Centre”. I understand District Centres to be large groups of shops, together with appropriate supporting non-retail facilities and services, which collectively form a coherent shopping centre. I am further advised they normally feature not less than 50 units, often many more, and are well placed to serve the County’s major population concentrations. To classify Station Parade as a District Centre demonstrates a serious failure to comprehend the nature of the facilities currently provided in the village centre and would leave the area at risk of further, future, damaging and inappropriate urbanisation.
5. There is a staggering proposal to develop more than 2000 housing units on the former Wisley Airfield at Ockham. This is represented as a new housing village. The impact on East & West Horsley of such a massive mixed housing, retail, commercial, traveller and schools development all less than two miles away would be significant and damaging. The additional proposals for extensive development at Burnt Common (400 houses and...
commercial developments), Gosden Hill Farm and Burpham (2000 houses and mixed use developments) only compound the adverse impact on East & West Horsley.

6. I am advised that there is a major doubt concerning the basis upon which the additional housing numbers have been proposed. It appears that the inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SMHA) that was generated by a consultant’s mathematical model but the basis and detail of that model is not provided or revealed in the Plan. Nor, I am advised, has the model been shared with Guildford Borough Council (GBC). I am advised that the SMHA target housing number has then been further increased by GBC to extrapolate a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. It is clear that the scale of this increase has alarming consequences and produces potentially unsafe results such as a projected increase of up to 35% in existing Horsley households. This, I am advised, is greater than any other single area in the Borough and tends to suggest that the basis upon which the number of additional houses has been calculated may be in need of the most careful scrutiny.

For these reasons I must register my objection to the Plan as currently proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2675  Respondent: 15568225 / Caroline Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident in Heatherdene, West Horsley, I write to object to the planning proposals to the Horsley areas.

I object to the amount of housing proposed to be built in the Horsley areas. The roads and local infrastructure will not be able to support the increased population within it's own areas and those of close surrounding areas and will be detrimental to the local residents and safety of all.

The numbers proposed must be revised to keep Horsley area roads safe for children and elderly and free from increased traffic pollution.

Particular attention to the widths of the pavements along the Ockham Road North and South needs to be considered: narrow pavements with a heavy increase in vehicle numbers both commercial and private vehicles poses an increase in potential to traffic accidents and risk to pedestrians. Air quality will undoubtedly be effected negatively too.

Increase in the requirement for doctors surgeries, dentists etc would not be covered by current local infrastructure, and realistically there would be an extended period of potential years of chaos whilst a 'catch up' plan is implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11112  Respondent: 15568257 / Rebecca Noke  Agent:

Page 651 of 1920
I strongly object to the Guildford Local Plan 2016. As a fairly new resident to Chilworth, I was incredibly upset to learn that it was planned that Chilworth plus the other surrounding villages such as Shalford should be removed from the Green Belt, for this is the very reason we decided to move here. The area needs to be protected from over-development. As it is, Chilworth and Shalford have quite a lot of traffic going through it and we certainly do not need more. Extra developments would lead to a change in the infrastructure (roads etc.) which would spoil the area completely. Guildford’s surrounding villages are a huge asset and attracts many tourists and visitors and must be protected at all costs. I would urge you to reconsider the new local plan and keep the area protected.

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 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
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: PSLPS16/5644  Respondent: 15568449 / Hannah Cheese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to totally OBJECT to the continued inclusion of the former Wisley airfield now known as Three farms meadows as a strategic site in the local plan. I object to the total destruction of the historic village of Ockham where I have lived my whole life. The station, small lanes, schools, doctors surgeries and general layout of Ockham is not suitable in the slightest for this massive encroachment on the green belt, they are already at maximum capacity. It would ruin every part of living in Ockham and the beautiful countryside surrounding it which we should preserve for future generations. This would be the greatest disruption to the green belt in the entire country and this is why I completely object to over 2000 houses being built in my village.

To summarise I once again want this development out of the local plan and totally object to the continued inclusion of the former Wisley airfield now known as Three Farms Meadows as a strategic site in the local plan.

Please take my reasons into consideration and understand what massive destruction this would cause to not only the people that live in Ockham but all the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5645  Respondent: 15568481 / Sam Attard  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 GBC’s Proposed Submission Local Plan unreservedly. As a local resident I have objected to all
the proposals the GBC has put forward along with thousands of others in our area. It really is appalling that our objections
have been completely ignored and the Local Plan has failed in the number of key areas to take into account or to answer our
valid comments and criticisms submitted by thousands of residents and organisations in respect of the previous 2013 Draft
Local Plan. What is the point of us all objecting whole-heartedly if we are just ignored. I have to say that in my opinion it
raises questions about your governance and vested interests.

The meeting on 8th April regarding The Wisley Property Investments Ltd (WPIL) planning application of January 2015
(Ref: 15/P/00012) was unanimously rejected by GBC following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

(a) was an inappropriate development within the Green Belt;

(b) would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes
of including land within the Green Belt;

(c) failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to
the Green Belt and the other harm identified;

(d) failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG
Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;

(e) was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.

(f) would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe
impact on the efficient operation of the local road network;

(g) failed to deliver the required transport sustainability measures;

(h) failed to secure an appropriate provision of affordable housing;

(i) was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;

(j) would result in loss of the safeguarded waste site;

(k) presented a dense and urban form of development owing to its quantum and scale;

(l) had an adverse impact on the setting and significance of a designated heritage asset;

(m) had an unacceptable air quality impact;

(n) impacted on education infrastructure;

(o) impacted on policing infrastructure;

(p) impacted on health infrastructure;

I object very strongly to the submission of the local plan, on the above reasons, specifically for The Three Farm Meadows
(the former Wisley Airfield).

**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): ()

Council draft Local Plan Site Allocation A35 Former Wisely Airfield

We wish to object to proposed development for the following reasons:-

1. The removal of the site from the green belt.
   1. No exceptional reasons are given for the action in 1. above.
   2. Generous amounts of brownfield land is available in urban areas.
   3. The nearby villages of Effingham, Ripley, Ockham and the Horsleys will be severely affected.

5. Ockham with only 159 residences will be completely overwhelmed by 2000 dwellings up to 5 stories high.

6. Hatchford with 60 dwellings off Ockham lane would be severely affected. 2000 additional dwellings with -overtime- say 4000 cars will have very significant effects on local and main roads including safety. The A3 is often blocked by cars queueing to exit onto the M25 causing tailbacks and some “shunts”.

8. At present the roads through and around Cobham are often blocked at peak times.
   1. There is very little provision of cycling and footpaths and the increased traffic would make these activities extremely dangerous.
   2. The local rail stations could not cope with large increases in traffic and of course the car parking facilities are already over capacity/ 11. Air quality is of vital importance and due to the existing traffic and the number of planes this is vital and has not been given proper consideration.
   3. Insufficient consideration is given to the existence of SPA, SSSI, and SNCI sites.

13. This development was unanimously rejected by the Planning Committee on 8th April 2006 and this should be repeated for the new application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2678  **Respondent:** 15568545 / Eleanor Bound  **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 grown up in Horsley and strongly object to the new plans for increasing the number of housing to the area and removing us from the green belt. The green belt was put in place to protect rural areas from development so I find it bizarre that such intensive urbanisation is being purposed in an area that has previously been categorised as an region worth conserving. The roads are already overcrowded and, at peak times, fail to cope with the volume of traffic and size of larger vehicles. This issue will be magnified if these plans go through. Doctors surgeries and schools are already struggling with numbers.

Moreover, many people from the city move out to places, such as Horsley, to escape from busy city life and enjoy the picturesque surroundings found in the Green belt. Not only is it a stunning location for city workers to set up a family life, but Surrey's countryside is often used as day trips for Londoners. Small villages such as Shere, which receive many tourists due to its classic English village feel, will no longer possess their traditional charm but be transformed into heavily developed and overcrowded centres; no longer appealing to tourists. We don't want London to end up like cities in America, such as LA, which expand over huge areas with no clear center and boundaries.

I don't want to see this beautiful area be ruined so strongly object to these new plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I wish to Object to the insetting of Shalford as mentioned in the Guildford Plan 2016.

I live in an area of outstanding natural beauty and wish it to stay this way. The plan has not properly been thought out and the roads that are suggested to be used for more traffic are not appropriate for use, and will increase CO2 pollution in the local areas suggested.

Please rethink your planning with a more environmentally sound concept. Plenty of homes are not occupied in the local area, why not work to use what already exists rather than create more housing monstrosities in a beautiful 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): ()

I am writing to you to express my views and concerns regarding your plans for building development in East and West Horsley.

Having been born and living in West Horsley for 48 years, I have noticed many changes over the years in regards to a lack of smaller housing and infrastructure.

Though I believe there is a need for housing, I also believe your quantities of houses and time scales are far too brutal (ie: an increase of 35% I believe) for the current infrastructure ie: Shops, Roads, schools, doctors appointments, parking etc.

I think a more prudent approach to new houses and building timescales will allow problematic local issues to arise in a more controllably fashion, and therefore will be resolved more easily.

Which in turn will be less traumatic for current residents and future one

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/11  Respondent: 15568929 / Elizabeth Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9].

My objections are:

1) disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]

2) 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

3) ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

4) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide [Policy A26].

5) The proposed link road from the A31 to the new sire passes through historic & AONB land, this traffic route seems unviable.
6) The housing need seems un substantiated. A review of the Strategic Housing Market Assessment commissioned by Guildford Residents Association has identified a flaw in the way that the housing need figure has been calculated, this needs to be reviewed prior to any sites being allocated.

Furthermore I wish to object to the removal of SRN6 offering a safe access to Beechcroft Drive, currently studies show this as a dangerous junction and offering no resolution to the residents in the local plan is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11128  Respondent: 15568993 / Jim Edgington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 greenbelt should be protected for our children’s sake. There are plenty of smaller alternatives for housing, so let’s exhaust them first and deal with our traffic issues at the same time. Large estates on the edge of town are not the answer. If we really have to do so then please give the small builder and self-builder a chance and sell of the plots not hand over large developments to the greed of a few. I expect the borough council prefer it but the generic housing that we put up with is unsightly, dull, unimaginative and out balances profit over architectural innovation and inspiration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11129  Respondent: 15568993 / Jim Edgington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 hear my objection to the local town plan. I feel Surrey University is not playing it part in the community and putting pressure on housing. They failed to deliver the student housing that they promised back in 2003 and in recent times the students have been feeling the negative effects of this. It’s not good looking back at the estate that I grew up on and seeing it almost lost to student housing. As for the town centre there are plenty of brown field sites being ignored in favour of retail property. Do we need 40% more shops, when more and more of us are turning to the online shop?

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>As a resident of Heatherdene, West Horsley. Please accept this as 'my objection' to the plans in East and West Horsley to change the green belt and to build an excessive number of houses and also the plans at the old airfield site at Wisley</td>
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<td>I object to Policy Numbers A27, A28, A29 and A46 due to loss off green belt in Normandy and loss of green space in Ash/Tongham, additional traffic (the roads in the area already struggle to cope with the amount of traffic) and the extra demand for services such as Doctors.</td>
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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): ()

It is wrong to build on green belt land, destroying the countryside and natural habitats which are home to endangered wildlife.

It is wrong to take the population density of the area to the proposed level, which is higher than the majority of London boroughs. Five storey developments do not suit the area, and besides, the area does not have the infrastructure to support such a high density of residents.

The development will overcrowd the area and I object to this. The development will make traffic and parking in the local area even more treacherous. As a competitive cyclist myself, I would mock the planning team’s idea that there would be an useful/positive increase in cycling. The majority of local routes are long, windy country lanes with very little cycling safety – plenty of blind spots and no cycle lanes, putting cyclists lives at risk. The increased traffic (estimated 4,000+ cars) from the new homes would make the cycle routes even more dangerous. The routes are hardly efficient for commuting!

I believe the development will take pollution to dangerous levels that could worsen the health of local residents. Air pollution in the development area already exceeds levels recommended by the EU and this should be taken seriously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5658  Respondent: 15569217 / Stephen Mahon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

DOBJECTION 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

I write to express my objection to the removal of the former Wisley Airfield from the Green Belt.

The area serves a vital role in preventing urban sprawl and development would create an urban corridor stretching from London to Guildford. There are no exceptional circumstances established to warrant removing the site from the Metropolitan Green Belt. There is ample brown field land in urban areas which needs to be regenerated without the need to encroach on protected Green Belt land.

The local plan as drafted poses a threat to the historic rural settlements of Ockham, Hatchford and Downside.

The potential to create an additional 2,000 homes in close proximity would be disastrous for the general area and Cobham.
The traffic congestion would be horrendous and the infrastructure simply will not cope with such a large development. The shopping and rail facilities at Cobham are already saturated.

We are supposed to have a Green Agenda but this cannot be the case when developments of this type are under consideration. Not only would air quality be severely impaired but the area is a haven for wildlife with protected species on and near the site.

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 the Planning Officers.

On this basis, I cannot comprehend why the former Wisley Airfield should be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2692  Respondent: 15569249 / Nick Fox  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 proposed housing planning and number of houses in the Horsley area.

This is totally unacceptable, far too many as the infrastructure cannot cope. I worry this is a proposal to get through some houses which I would also object to, as we cannot cope with anymore houses in the area.

So please I do not wish any houses to be built 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: PSLPP16/11137  Respondent: 15569281 / Stan Long  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 current Local Plan proposals and endorse the Guildford Residents Association rejection of expanding housing in Guildford so dramatically. There is no realistic justification for such an increase in housing for the people currently dwelling in Guildford.

In the last 30 years of living in Guildford, I have seen the continual approval of piecemeal speculative developments of ever increasing. In that time no serious strategic plan to improve the local infrastructure has been made to cope. Therefore the traffic congestion, and associated dangerous pollution, has steadily eroded the quality of living in the town. To embark on a further massive expansion in housing with no improvement to the A3, no solution to the new north-south route through Guildford, and no additional crossing of the river Wey in the town centre, is irresponsible. We are still (just) proud of our town but are already living with the chronic failure of the Planning Department to actually plan ahead. This draft Local Plan must be radically improved and any substantial new development made conditional upon prior infrastructure improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2694  Respondent: 15569345 / Alexander Alexiou  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 building 45 houses at Clockbarn Nursery. This is a ridiculous idea. Tannery lane is a narrow and bendy road joining Send Road at a very difficult and potentially dangerous junction. The traffic in Send is already heavily congested and further traffic emerging from Tannery Lane will only make this worse. Traffic improvements at the junction will not help, as the congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. The future traffic has already been exacerbated by planning permission for 64 apartments and a marina further down Tannery Lane.

Local councillors and central government gave a clear election promise to protect the Green Belt. The current proposals renge on those promises.

1. I object to Send being removed from the Green Belt. The Green Belt was established as a permanent feature required by the National Planning Policy Framework and not something that can be taken away under pressure from property developers, unjustified government targets or a Borough Council who prefers to develop in the areas that they believe will give them the least resistance.

There are no special circumstances to justify Send losing its Green Belt status and as a buffer to separate Guildford from Woking it is essential that its Green Belt status be retained.

Local councillors and central government gave a clear election promise to protect the Green Belt. The current proposals renge on those promises.

1. I object to building 400 houses and 7000m^2 of industrial space at Garlick’s Arch. Ancient woodland! Subject to flooding! Plenty of brownfield sites already available in the borough! Slyfield is already the industrial centre of Guildford Borough so why create another one especially as there is an over supply of industrial space in the area at the moment and for the foreseeable future. In addition, Guildford’s housing plan requirements have been shown to be grossly exaggerated and when challenged, the council refuses to release their calculations.

1. I object to the development of 40 houses and 2 travellers’ pitches at Send Hill. Another ridiculous idea. As with the Clockbarn proposal, the affect of the additional traffic on the already congested Send Road will be
significant and unacceptable. Send Hill is also a narrow residential lane and will be badly affected by the additional traffic.

1. **I object to a new interchange with the A3 at Burnt Common.** I have already described how Send Road is heavily congested especially at peak times. By creating a new interchange at Burnt Common this will choke Send Road and the Village with additional traffic to and from Woking. Not only will this become the new rat run into Woking from the A3 and the M25 but will also have to contend with additional traffic from the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and 1850 houses at Blackwell farm. This on a road that is already heavily congested.

I urge you to reconsider before inflicting irreversible damage to our communities - because that is exactly what you will be doing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2695  **Respondent:** 15569377 / Catherine Hunter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO  the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3780  **Respondent:** 15569377 / Catherine Hunter  **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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Page 664 of 1920
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: PSLPP16/11144  Respondent: 15569377 / Catherine Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the lack of immediate provision for new schools

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:

Comment ID: PSLPP16/15965  Respondent: 15569377 / Catherine Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the lack of immediate provision for new schools

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:

Comment ID: PSLPP16/11142  Respondent: 15569377 / Catherine Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO all erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15963  Respondent: 15569377 / Catherine Hunter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO all erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11143  Respondent: 15569377 / Catherine Hunter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the disproportionate amount of development in one area of the Borough
I OBJECT TO the limited consultation period
I OBJECT TO the last minute inclusion of new sites with less than 2 weeks’ notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>1. I object to site A43, the proposal for the development of Garlick’s Arch. A43</td>
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<td>1. I object to the late inclusion of site 43. A43</td>
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1. I object to site 43a. This will increase traffic problems in the village. A43a

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11169  Respondent: 15569505 / David Hawkey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with 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. P2

The Government has stated its commitment to the protection of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11168  Respondent: 15569505 / David Hawkey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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 s2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11167  Respondent: 15569569 / Sethulekshmy Nair  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 need for Infrastructure

Even with a much smaller percentage increase in housing major issues need to be incorporated into the plan; underinvested public transport, gridlock at certain points at peak times, crumbling roads (without heavy construction lorries thundering down them), schools at capacity, struggling medical services, and even simple things like needing to add footpaths (for which there is no space) or to add crossings that are currently not needed. The plan does not seem sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11163  Respondent: 15569569 / Sethulekshmy Nair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to raise my objections to 2016 Guildford Borough Council's Draft Local Plan. My husband and I regularly visit East Horsley, where my son, his wife and young family live.

I go there weekly to look after two grandchildren. So not only do I know about the village they live in, but also the surrounding area which I love for its gorgeous, green countryside and quiet villages. This area is not only a true escape from the urban sprawl of London, but even from what you might perceive as the relative quiet suburbs of Camberley. Even if I don’t live there, changes will have a negative impact on me.

My main points of opposition to the Plan are:

Disregarding the Green Belt

The Surrey Hills areas of outstanding natural beauty must continue to be protected. It is too close to London to allow small chunks to be eaten away.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11165  Respondent: 15569569 / Sethulekshmy Nair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Impact on the community

The pressure for housing is obvious throughout the South East. With seemingly no national strategy, in an expensive area like Guildford will probably go the same way as an expensive area, like mine, in Camberley. There will be unrelenting demand from relatively well-off buyers from London. The housing density will increase. Absolute limits are needed to stop the villages turning into suburbia. The plan simply does not respect the character of the area.

The planned increase in housing in the villages seems out of balance when compared to larger towns and even urban London. The plan will wither away village life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (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 cause 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 (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposals for Blackwell farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/11218  Respondent: 15569889 / Avni Nicholls  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the 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 protest against the development on our green belt areas.

These are areas which prevent this small island from becoming one big concrete block, yes we do need to house people, however this cannot be done at the detrimental effect of destroying our countryside which is how the proposal intended will cause.

The overloaded services cannot sustain any more therefore more consideration needs to be taken to keep the area around London green. Affordable housing needs to be spread away from London to ensure other cities proper rather than placing a concentration to an already overload Capital.

Please think before making this monumental decision as there is no going back once it has been taken. Please don’t destroy our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy A15 - Land at Guildford Cathedral

This site is currently designated as protected open space. We write to object to the proposed redesignation of this site as C3 Housing for the following reasons.

1. This site is an important open green space, which benefits local residents in an area of Guildford which has few open green spaces for public enjoyment. In recent years, central Guildford has seen considerable development and it is more important than ever to protect our existing green spaces - especially in light of proposals to develop the neighbouring Guildford Park car park and station areas.

1. This site is the setting for the Cathedral, a Grade II Listed Building, which is an important Guildford landmark and which enjoys an elevated position visible from many other parts of Guildford. Development of this site for residential use will potentially obscure this listed building and impair views of the Cathedral from elsewhere in Guildford.

1. This site is not suitable for development for residential uses. It has a history of drainage and subsidence problems and would require extensive deep piling to accommodate 100 new homes. This in turn would have repercussions for existing homes in neighbouring roads (Ridgemount, Alresford Road, Scholars Walk etc) and would impact on the flooding problems that have been experienced in this area in recent years.

1. A development of up to 100 new homes on this site is disproportionate to the existing neighbourhood. Although we recognise that 100 homes is a reduction from the 175 homes specified in last year’s draft local plan, it is still an overpowering number of new homes in comparison with existing housing on neighbouring roads (Ridgemount, Alresford, Scholars Walk etc). Ridgemount and Alresford Road are minor roads with pedestrian pathways down only one side of the road. The additional traffic generated by 100 new homes would completely change the nature of these peaceful roads and would exacerbate the existing congestion problems on Madrid Road, Guildford Park Road and into Guildford Town centre. Further, it would put considerable additional pressure on the local infrastructure and amenities, such as schools, doctors surgeries etc.

In conclusion, we ask that this site should remain designated as protected open space and that the proposal to redesignate this site as C3 Housing be reconsidered and withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5682</th>
<th>Respondent: 15570017 / Joan Francesca Rae Quint</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>LOCAL PLAN FOR HOUSES AT HOG’S BACK.</td>
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<td>I OBJECT.</td>
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<th>Comment ID: PSLPP16/11226</th>
<th>Respondent: 15570049 / Faith McCarthy</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 write to say that I oppose the expansion of Guildford into the green belt surrounding the town and I support the well thought through opposition to the proposals that have been submitted by Guildford Residents Association</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: PSLPA16/2711</th>
<th>Respondent: 15570081 / Mark Stevenson</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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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I am writing to raise objections to the proposals set out in the above document. In particular, the proposals for sites A41 and A38 in the 'Sites' section of the Plan, appear to be at odds with Policy P2 (p42) and with the Council's obligations to retain local distinctiveness and to conserve and enhance the natural environment (as set out in the National Planning Policy Framework NPPF).

Site A41 is an area of sheep-grazed pasture adjoining an area of ancient semi-natural woodland to the east and south. The area is very clearly an integral part of the green belt landscape of sheep and cattle grazed pasture, with blocks of deciduous woodland, which forms a coherent landscape that stretches to the North Downs AONB. Policy P2 (p42) of the Plan allows for limited infilling, but the proposals for site A41 aren't infilling anything other than the landscape of woodland and pasture.

In addition, the ancient semi-natural woodland which adjoins A41 is listed on Natural England's priority habitat inventory, which shows the locations of habitats of principal importance (which can be viewed here: Magic Map Application). The site is already in poor condition due to illegal construction of cycle tracks and jumps, which is denuding the characteristic flora of ancient woodland. All public bodies have a duty to conserve habitats of principal importance under the Natural Environment and Rural Communities Act. The Plan does not articulate how the Council intends to discharge this duty. In fact the Plan does not even register the nature conservation interest of the site.

Site A41 suffers from similar issues. Whilst an argument could be constructed that the southern part of the site might constitute limited in-filling, the northern part of the site clearly extends the village boundaries and intrudes once more into the blocks of woodland and pasture that make up the characteristic green belt landscape.

As the largest proposed development in the West Horsley area (135 homes), the site seems completely out of proportion to the surrounding village. Longreach is a tiny lane, and the area has a rural character. Construction of 125 house would appear to be at odds with Policy D1 as set out in the plan. D1 states that all new developments will:

1. be designed to facilitate and promote walking, providing a high quality environment for pedestrians, and where possible allowing short walking distances to amenities
2. promote and reinforce local distinctiveness to create a sense of place, with innovative architecture encouraged and supported in the appropriate context

Site A41 will simply create more journeys. It is too far to walk to the shops or to the station. In addition, the area is locally distinctive because it is rural. 125 house will change the character - the site will lose its distinctiveness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4418  Respondent: 15570081 / Mark Stevenson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to express strong disapproval of the plans to remove West and East Horsley villages from the Green Belt and to build 485 new homes here.

We moved to West Horsley 6 years ago, as we were looking for a semi-rural location in which to bring up our young family, with all the benefits of low traffic, outdoor amenities and countryside, a small village school and a village community feel. The Horsley's are characterised by varied housing and buildings of historic value, with small green pockets of land in between, including ancient woodland and pastures. Green spaces are never far away. Under the current proposals, this would be irrevocably lost.

In addition, I do not believe that the infrastructure - the roads, drainage, schools, shops, parking, GPs, existing amenity areas - could cope with a 35% increase in housing over 5 years. The huge increase in the numbers of cars would destroy the quiet feel of the village and make travelling around and through the village very difficult and time consuming.

I accept the need for some more housing locally, but this needs to be in keeping with its Green Belt location and the size and character of 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): ()

I Object in the strongest possible terms to the Guildford Borough Council Draft Local Plan to 14,000 new homes with 70% on Green Belt, despite promises to protect it in last year's elections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11280  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D1 - Making Better Places

I object to 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: PSLPP16/11282  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2 - Sustainable Design, Construction and Energy

I 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?
Comment ID: PSLPP16/11286  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3 - Historic Environment

I object 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:

Comment ID: PSLPP16/11288  Respondent: 15570145 / Owen Eszeki  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 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?

Attached documents:

Comment ID: PSLPP16/11251  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

**Policy E1 - Meeting Employment Needs**

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.

**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: PSLPP16/11254  Respondent: 15570145 / Owen Eszeki  Agent:</th>
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**Policy E2 - Location for New Employment Floorspace**

I object to excessive development anywhere in the borough when brownfield sites are available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/11258  Respondent: 15570145 / Owen Eszeki  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
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</table>
**Policy E3** - 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?

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<th>Comment ID: PSLPP16/11262</th>
<th>Respondent: 15570145 / Owen Eszeki</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy E4** - Surrey Research Park

I 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:

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<th>Comment ID: PSLPP16/11265</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy E5** - 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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<th>Comment ID: PSLPP16/11270</th>
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**Policy E6 - 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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<th>Comment ID: PSLPP16/11276</th>
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**Policy E7 - 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:**
<table>
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<tr>
<th>Policy E8 - District Centres</th>
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<tr>
<td><strong>I object</strong> to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large development and ignore the wishes of residents in those local centres.</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>
<th>Policy E9 - Local Centres</th>
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<tr>
<td><strong>I object</strong> to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban.</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>
<th>Policy H1 - Homes For All</th>
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<tr>
<td><strong>I object</strong> to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. A new development at Blackwell Farm (2,000 houses) is not required to provide accommodation for students.</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>Attached documents:</strong></td>
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| Comment ID: PSLPP16/11237  | **Respondent:** 15570145 / Owen Eszeki  | **Agent:** |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 - Affordable Homes

I object that developers can be released from their obligation to provide affordable homes (clause 4.2.40).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/11239  Respondent: 15570145 / Owen Eszeki  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 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:

Comment ID: PSLP16/11290  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ID1 - 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:

Comment ID: PSLPP16/11292  Respondent: 15570145 / Owen Eszeki  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 12 - 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11294  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 13 - Sustainable Transport for New Developments

I strongly object to any development being built that does not have existing sustainable transport. Blackwell Farm, Wisley Airfield, Gosden Hill and Garlicks Arch do not have such facilities. The former Wisley Airfield is absolutely isolated and can only be accessed by car and even if a bus service is provided, few will carry shopping, etc., by bus. Blackwell Farm and Gosden Hill are in the same situation and none are accessible by foot. New developments should take place alongside existing sustainable transport facilities. The Merrow Golf Club, proposed for housing, is adjacent to a Park and Ride, that is an example of sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</th>
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<td><strong>Policy ID4</strong> - Green and Blue Infrastructure.</td>
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<td>I support this policy.</td>
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| Comment ID: | PSLPP16/11241  Respondent: 15570145 / Owen Eszeki  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| **Policy P1** - Surrey Hills Area of Outstanding Natural Beauty |
| I object that the AONB areas are excluded from taking a proportion of new housing developments. 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: | PSLPP16/11244  Respondent: 15570145 / Owen Eszeki  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
Policy P2 - Green Belt

I strongly object to 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11246  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

I 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: PSLPP16/11248  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4 - Flood Risk and Water Source Protection Zones

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:
Comment ID: PSLPP16/11234  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1 - Presumption in Favour of Sustainable Development

I object to 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11235  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 GBC using SHMA housing figure which are almost double those of Woking and Waverly

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11279  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy D1 - Making Better Places**

I object to 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:

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**Comment ID:** PSLPP16/11281  **Respondent:** 15570209 / Emily Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy D2 - Sustainable Design, Construction and Energy**

I 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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**Comment ID:** PSLPP16/11283  **Respondent:** 15570209 / Emily Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy D3 - Historic Environment**

I object 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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**Comment ID:** PSLPP16/11284  **Respondent:** 15570209 / Emily Cross  **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 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?

Attached documents:

Comment ID: PSLPP16/11255  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1 - Meeting Employment Needs

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11257  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy E2** - Location for New Employment Floorspace

I object to excessive development anywhere in the borough when brownfield sites area available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11260  Respondent: 15570209 / Emily Cross  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): ()

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**Policy E3** - 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:

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Comment ID: PSLPP16/11263  Respondent: 15570209 / Emily Cross  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): ()

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**Policy E4** - 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:

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Comment ID: PSLPP16/11266  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Policy E5 - 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:

Policy E6 - 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:

Policy E7 - 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: PSLPP16/11274  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7 - Guildford Town Centre

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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: PSLPP16/11275  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8 - District Centres

I object to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large development and ignore the wishes of residents in those local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11277  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9 - Local Centres

I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11242  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 - Homes For All

I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. A new development at Blackwell Farm (2,000 houses) is not required to provide accommodation for students.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11243  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H2 - Affordable Homes

I object that developers can be released from their obligation to provide affordable homes (clause 4.2.40).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11245  Respondent: 15570209 / Emily Cross  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 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:

Comment ID: PSLPP16/11285  Respondent: 15570209 / Emily Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1 - Infrastructure and Delivery

I object 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:

Comment ID: PSLPP16/11287  Respondent: 15570209 / Emily Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Policy 12 - 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy 13 - Sustainable Transport for New Developments

I strongly object to any development being built that does not have existing sustainable transport. Blackwell Farm, Wisley Airfield, Gosden Hill and Garlicks Arch do not have such facilities. The former Wisley Airfield is absolutely isolated and can only be accessed by car and even if a bus service is provided, few will carry shopping, etc., by bus. Blackwell Farm and Gosden Hill are in the same situation and none are accessible by foot. New developments should take place alongside existing sustainable transport facilities. The Merrow Golf Club, proposed for housing, is adjacent to a Park and Ride, that is an example of sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy I4 - Green and Blue Infrastructure.

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

I object that the AONB areas are excluded from taking a proportion of new housing developments. 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.

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Policy P2 - 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11250  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

I 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: PSLPP16/11252  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4 - Flood Risk and Water Source Protection Zones

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:

Comment ID: PSLPP16/11238  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S1 - Presumption in Favour of Sustainable Development

I object to 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11240  Respondent: 15570209 / Emily Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 GBC using SHMA housing figure which are almost double those of Woking and Waverly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2716  Respondent: 15570273 / Barnaby Geib  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: PSLPA16/2717  Respondent: 15570273 / Barnaby Geib  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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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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</table>
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: | PSLPS16/5686 | Respondent: | 15570273 / Barnaby Geib | 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: | PSLPP16/11259 | Respondent: | 15570273 / Barnaby Geib | 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:
Table containing comments on the document:

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<td>PSLPP16/11269</td>
<td>15570273 / Barnaby Geib</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</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>
<td>I object to the lack of proper infrastructure planning for sites (Policy 11)</td>
<td>The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?</td>
<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>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</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>
<td>I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12)</td>
<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>
<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>PSLPP16/11267</td>
<td>15570273 / Barnaby Geib</td>
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<td>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>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</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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Comment ID: PSLPP16/11256  Respondent: 15570273 / Barnaby Geib  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11261  Respondent: 15570273 / Barnaby Geib  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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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:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11253</th>
<th>Respondent: 15570273 / Barnaby Geib</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 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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Do you consider this section of the document; complies with 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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<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)

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:

<table>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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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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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPS16/5690  Respondent: 15570305 / Richard Gray  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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: PSLPP16/11300  Respondent: 15570305 / Richard Gray  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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: PSLPP16/11295  Respondent: 15570305 / Richard Gray  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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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Do you consider this section of the document; complies with 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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<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 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 congestion that development will cause to the trunk roads A3/M25 (Policy12).

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11297  Respondent: 15570305 / Richard 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 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11304  Respondent: 15570305 / Richard 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): ()

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: PSLPP16/11302 | Respondent: 15570305 / Richard Gray | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to development in areas 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: PSLPP16/11305 | Respondent: 15570305 / Richard Gray | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the local plan as the development proposed is not sustainable (Policy S1) |
| The 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: PSLPP16/11301 | Respondent: 15570305 / Richard Gray | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
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: PSLPP16/11306  Respondent: 15570337 / Ann 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): ()

We are dismayed to find that GBC is planning to build several hundreds of houses on green belt and farmland close to our homes. The traffic will increase exponentially along these country lanes and we will lose the green and pleasant atmosphere that we currently enjoy. Please reconsider more brown field sites and land closer to the centre of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5697  Respondent: 15570433 / Norma Farrer  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 very strongly to the plans put forward for the Horsleys and most of all to the development of the former Wisley Air Field.

The infrastructure is totally inadequate for the number of units planned. The local schools and medical facilities are already overloaded and of course there would be added strain on Guildford Royal Surrey with extra houses in this area and all the other area's within the Guildford boundaries.

The roads are not of the necessary size or structure to take the additional traffic, at times they are unable to cope already especially around school start and finish times.
There are many brown sites that should be developed without intruding on the Green Belt. It cannot be right to double the size of this area which is totally unsuitable for this size of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3653  Respondent: 15570817 / Tom Edelsten  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: PSLPA16/3648  Respondent: 15570817 / Tom Edelsten  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.

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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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
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since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received
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previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
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premises and should be reconsidered.

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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.
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that their decision making process was flawed and thus subject to being set aside by the Inspector.

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balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very
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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: PSLPS16/6961  Respondent: 15570817 / Tom Edelsten  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 Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25 J10 (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: PSLPP16/11356  Respondent: 15570817 / Tom Edelsten  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: PSLPP16/15303  Respondent: 15570817 / Tom Edelsten  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: PSLPP16/15345  Respondent: 15570817 / Tom Edelsten  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: PSLPP16/15292  Respondent: 15570817 / Tom Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15293  Respondent: 15570817 / Tom Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the 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: PSLPP16/15301  Respondent: 15570817 / Tom Edelsten  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: PSLPP16/15351  Respondent: 15570817 / Tom Edelsten  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:
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: PSLPP16/15326  Respondent: 15570817 / Tom Edelsten  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: PSLPP16/15335  Respondent: 15570817 / Tom Edelsten  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: PSLPP16/15346  Respondent: 15570817 / Tom Edelsten  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</th>
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<tbody>
<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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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
<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>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>
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>PSLPP16/15316</th>
<th>Respondent:</th>
<th>15570817 / Tom Edelsten</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11341  Respondent: 15570817 / Tom Edelsten  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): ()

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 the Plan.

I frequently visit my daughter and son-in-law who live off The Street. Every week this entails many trips to neighbouring villages with small children in the car. The current density of road traffic along The Street makes joining and leaving it on a blind corner a hazardous action; it’s feels as though it’s only a matter of time when, not if, there will be an accident. The children’s ages are 2 and 4; we are confronted with lorries, high-speed bikes and hastening commuters on a daily basis. The only time it feels safe to join the road is when there is one of the rush hour jams.

This is the present situation in a rural village. The consequences of a huge boost in the local population doesn’t bear thinking about.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15325  Respondent: 15570817 / Tom Edelsten  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: PSLPP16/15356  Respondent: 15570817 / Tom Edelsten  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 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.

There is already considerable concern in the village because of the narrow road running through it. At the particular point where we are, opposite the Church, there is already a bottleneck which it is impossible to change – listed buildings of historic interest etc. At several points in the village, there are tight corners, which cannot be changed because of constriction by buildings, walled gardens, listed features etc.

This isn’t even the narrowest point.

I am by now very familiar with the road through the village and am already concerned about how much traffic “cuts through”; given the lack of facility for expansion, this can only become worse. The plan would seem to be complete madness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15282  Respondent: 15570817 / Tom Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/15287  **Respondent:** 15570817 / Tom Edelsten  **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: PSLPP16/15268  Respondent: 15570817 / Tom Edelsten  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. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. 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>Comment ID: PSLPP16/11343</th>
<th>Respondent: 15570817 / Tom Edelsten</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to 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 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: SQLP16/1706  Respondent: 15570817 / Tom Edelsten  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 (e.g., 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: SQLP16/1711  Respondent: 15570817 / Tom Edelsten  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 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: SQLP16/1716  Respondent: 15570817 / Tom Edelsten  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 reassessed 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: SQLP16/1721  Respondent: 15570817 / Tom Edelsten  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 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
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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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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: pslp172/4366  Respondent: 15570817 / Tom Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2795  Respondent: 15570817 / Tom Edelsten  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/523  Respondent: 15570817 / Tom Edelsten  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: PSLPP16/11357  Respondent: 15570977 / Mark Negus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter. We simply do not have the infrastructure and are physically constrained.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15571009 / Damien Short</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): ()

GEF also highlight that there is no objectively assessed need for housing yet established, since the figure used is based on a Strategic Housing Market Assessment that is not transparent in its methodology. Whilst the document has been produced externally to the Council, apparently by established practitioners in the field, and claims to have produced a measure of the “objectively assessed needs” the methodology used by them is (still) being claimed to be confidential. This is outrageous, and demonstrably undemocratic as it denies the public the means by which to assess the veracity of the conclusions therein.

**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): ()

There are some good aspects of the Proposed Submission Local Plan: strategy and sites 2016 but it is deeply flawed in critical areas, as identified by the Guildford Environmental forum of which I am a member. However, I write to you in a personal capacity as a concerned resident of the village of Chilworth and as an academic who works on the social and environmental impacts of encroachments on green spaces from extractive industry developments (which we already have now in Albury village) to inappropriate housing developments which in affectively privatise green spaces, public spaces, common land and green belt rural areas often for the gain of property ‘developers’ – this is compounded by the frequent rhetorical spin of providing for the ‘housing needs of the poor’.

In a society dominated by private property and private capital, where landlords are permitted to allow dwellings to sit unoccupied and where local councils’ first recourse is often to develop green spaces rather than brownfield sites or vacant sites previously run by commercial activities, the last thing our local borough needs is encroachment on that which makes it
special and valuable. The Surrey Hills are an AONB with good reason, they are a beautiful biodiverse area which must be protected from development that will add yet more environmental degradation and CO2 emissions to our already endangered ecosystems and atmosphere. Let’s be clear; ALL development will do this despite the rhetoric of ‘sustainable development’. The villages of Shalford and Chilworth should not be taken out of the Green Belt. They provide vital ecological and social services, as Green Belt land, dimensions which would be ruined by further development of any kind.

The Proposed local plan is unsound as it fails to recognise the constraints placed on ‘the objectively assessed needs for housing’ by the Green Belt. It is quite clear in the government guidance on the NPPF that objectively assessed needs are constrained by designations such as the Green Belt. As GEF point out:

“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 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: PSLPS16/5699  Respondent: 15571041 / William Cardiff  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 strongly object to any A31/Blackwell development An outrageous misuse of green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2730  Respondent: 15571169 / Pamela Bevington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to any A31/Blackwell development An outrageous misuse of green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The basis on which the council calculated the number of new homes across the whole borough that is required is highly questionable. They are massive mathematical doubts about the basis of the calculations, which in any case have not been released or discussed publicly. In addition the population increase forecasts used in the Plan are about 70% higher than the official national estimates for population growth. This would result in a 35% growth of existing West Horsley households, which is unsupportable, not necessary, and totally inequitable.

We find it very frustrating that after two years consultation, meetings, discussions, that the Borough Council has basically made no changes to its original inaccurate assumptions, or amended the flawed areas of the original plan in any whatsoever. Too much response seems to be driven by reacting to Building Developers' planning approaches rather than creating an overall modern Borough plan that will meet the needs of the residents, and allow well-planned and well-justified growth in the most appropriate areas. Brownfield in Guildford should also certainly not be ignored because it is supposedly 'more difficult and costly'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2729  Respondent: 15571169 / Pamela Bevington  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 with reference to the above, being an update of the 2014 plan. Unfortunately the Borough has taken very little, if any, notice of the comments made and meetings held after the last plan.

The major points of concern that my wife and I share are as follows:

Why has East Horsley been selected for such a large number of proposed houses when there are still ample brownfield sites within Guildford itself to build upon - within an existing urban environment? The percentage increase in housing for Horsley is amongst the highest of the whole plan!

Why has the village of East Horsley and its proposed expanded boundary has been removed from the Green Belt? This will destroy the nature of the village, and it's infrastructure will be swamped. An incredibly short sighted approach!

No exceptional circumstances have been demonstrated by the council to justify this unacceptable step of removing the Horsley villages from the Green Belt. In addition, the proposed extension of the boundaries of the Settlement areas of the Horsleys have not been justified, they appear to be aimed solely at increasing the land available for future additional development, which only increases congestion and infrastructure pressure even more!

There is also a proposed changes in the designation of Station Parade into a "District Centre". This seems designed only to enable further future urban developments above the current excessive plans. No rationale for this has been expressed, and this move would obviously also add further congestion and pressure on infrastructure and the quality of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5705  Respondent: 15571169 / Pamela Bevington  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): ()

Added to this is the continued efforts of the Council to build over 2000 homes on Wisley airfield, which is under 2 miles away from our village. This, of course, would add amazing extra pressure on the infrastructure and facilities; particularly medical, schools, roads, station parking and lack of seats on commuter trains into London, all of which would be totally unable to absorb this!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11387  
Respondent: 15571169 / Pamela Bevington  
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 question of air-quality around the A3 has also been totally ignored. The existing situation in that the area around Wisley Airfield already breaks the maximum levels of pollution allowed by UK environmental laws. Adding the proposed numbers of houses on the airfield, plus the unrealistic increase in housing proposed for the Horsleys, will make this situation not only much worse, but exceedingly dangerous to many residents of supposedly rural country villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11389  
Respondent: 15571169 / Pamela Bevington  
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 Green Belt and the villages within it should be protected and not destroyed by the existing flawed planning approach, and we respectfully request that new plans be prepared that actually take into account the comments made by both experts and the local population, who, after all, will have to live with the consequences of the decisions that might be made!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3651  Respondent: 15571201 / Zoe Dudgeon  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: PSLPA16/3646  Respondent: 15571201 / Zoe Dudgeon  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.

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built 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: PSLPS16/6963   Respondent: 15571201 / Zoe Dudgeon   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:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11402</th>
<th>Respondent: 15571201 / Zoe Dudgeon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</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>
</tr>
</tbody>
</table>
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.

16.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15305  Respondent: 15571201 / Zoe Dudgeon  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: PSLPP16/15343  Respondent: 15571201 / Zoe Dudgeon  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: PSLPP16/15289  Respondent: 15571201 / Zoe Dudgeon  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: PSLPP16/15296  Respondent: 15571201 / Zoe Dudgeon  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: PSLPP16/15299  Respondent: 15571201 / Zoe Dudgeon  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: PSLPP16/15353  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15338  Respondent: 15571201 / Zoe Dudgeon  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:** PSLPP16/15328  **Respondent:** 15571201 / Zoe Dudgeon  **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: PSLPP16/15333  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and
explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk
and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The
price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when
developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location
close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount
of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now
having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the
original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11408  Respondent: 15571201 / Zoe Dudgeon  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3- Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related". Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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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: PSLPP16/15315  Respondent: 15571201 / Zoe Dudgeon  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:  PSLPP16/15323  Respondent:  15571201 / Zoe Dudgeon  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:  PSLPP16/15279  Respondent:  15571201 / Zoe Dudgeon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.)

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15284  Respondent: 15571201 / Zoe Dudgeon  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: PSLPP16/15271  Respondent: 15571201 / Zoe Dudgeon  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. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. 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: PSLPP16/15276  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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 houses 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 not 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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<th>Comment ID:</th>
<th>SQLP16/1704</th>
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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?**

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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?

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Do you consider this section of the 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 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:
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:

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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.
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8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
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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: PSLPA16/2740  Respondent: 15571425 / Monika Neczaj  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 SPECIFICALLY TO 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 just 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”.
• 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: PSLPS16/5711  Respondent: 15571425 / Monika Neczaj  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(SITE) 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: PSLPP16/11458  Respondent: 15571425 / Monika Neczaj  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: PSLPP16/11459  Respondent: 15571425 / Monika Neczaj  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: PSLPP16/11461  Respondent: 15571425 / Monika Neczaj  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: PSLPP16/11463  Respondent: 15571425 / Monika Neczaj  Agent:

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### 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: PSLPP16/11445  Respondent: 15571425 / Monika Neczaj  Agent:

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### 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:

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Comment ID: PSLPP16/11447   Respondent: 15571425 / Monika Neczaj   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): ()

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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:

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Comment ID: PSLPP16/11448   Respondent: 15571425 / Monika Neczaj   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): ()

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I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO POLICY E5 (RURAL ECONOMY):

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

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: PSLPP16/11453</th>
<th>Respondent: 15571425 / Monika Neczaj</th>
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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 (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.
- 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?

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<th>Comment ID: PSLPP16/11454</th>
<th>Respondent: 15571425 / Monika Neczaj</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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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<th>Comment ID: PSLPP16/11456</th>
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<tr>
<td>I OBJECT TO POLICY E9 (LOCAL CENTRES):</td>
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<tr>
<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>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>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</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:

Comment ID: PSLPP16/11438  Respondent: 15571425 / Monika Neczaj  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 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:

Comment ID: PSLPP16/11464  Respondent: 15571425 / Monika Neczaj  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 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: PSLPP16/11465  Respondent: 15571425 / Monika Neczaj  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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11466  Respondent: 15571425 / Monika Neczaj  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:

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Comment ID: PSLPP16/11468  Respondent: 15571425 / Monika Neczaj  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): ()

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I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):

- 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:

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Comment ID: PSLPP16/11439  Respondent: 15571425 / Monika Neczaj  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 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.
• “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.
• 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: PSLPP16/11469   Respondent: 15571425 / Monika Neczaj   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:

• No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11441   Respondent: 15571425 / Monika Neczaj   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
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I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt.
- 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 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?

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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: PSLPP16/11431  Respondent: 15571425 / Monika Neczaj  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:

Comment ID: PSLPP16/11433  Respondent: 15571425 / Monika Neczaj  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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. 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.
- 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.
- 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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<th>Respondent: 15571489 / Kimberly Tyler</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
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**Do you consider this section of 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 based on the following points:

1. **Greenbelt:** This area is protected Greenbelt land and there is not supposed to be any development taking place here. This land is protected and this is an undisputed fact. This should not be changed in any way just because an over-zealous development company are interested in making as much money as possible. A decision in favour of this development will be to the absolute detriment of the citizens that actually have to live with the consequences.

2. **Impact on Residents:** This will be a 100% increase in the number of homes in this area. The reason most of the current residents moved out here in the country is because we want to live in a rural setting. This development will destroy that and goes against everything the citizens of this area want. You will be hard pressed to find one local citizen who actually thinks this plan is a good idea. This proposal has been extremely stressful for residents and will continue to be until this draft is denied.

3. **Wildlife:** There are a number of protected wild animals currently living on the proposed area including deer, foxes, hedgehogs, pheasants, various birds including great spotted and green woodpeckers, adders, dormice, frogs and toads. The development will without a doubt destroy their ecosystems and drive them from the area or perhaps even kill them. We have a family of three deer living in the adjoining forest next to our house and this year the female gave birth to a fawn. We have really enjoyed seeing them in the fields and my daughter considers them part of her family as well. If this development were to happen, the most heart-breaking effect from this will be the detrimental impact this will have on the wildlife of this area.

1. **Traffic Issues:** The impact on traffic will cause major delays on Glaziers Lane and Westwood Lane. The infrastructure simply cannot cope with the huge volumes of cars from the extra houses that they want to build. No highway improvements can be made to help cope with this. We have unfortunately already had two motorist fatalities, as well as countless pets getting killed, on this road and this is not something that we want to have happen again. Glaziers Lane is a very narrow road and there’s no way it can be widened. Cars already travel at a high rate of speed down the lane anyway, so I cannot imagine the impact thousands of more homes will have on this lane. I am a mother of a young daughter and I’m already afraid to let her play in the front yard, due to the traffic on this road. Please do not allow this development company to jeopardize the safety of citizens in this area.

2. **Secondary school?** A secondary school appears to have been offered by the developers. But why? There is currently no existing demand or requirement for another secondary school in the area. The local secondary schools are currently undersubscribed. In previous local reviews, Surrey County Council disputed the need for another school. The developers have portrayed that they have a solid plan because they are offering a school, but a school is not even needed, so what is the point of this? There is no logic in this. Additionally, the area is subject to flooding so the playing fields of the schools will get flooded on a regular basis. There is a lack of safe...
transport links to the school for teenagers. Glaziers Lane and Westwood Lane don’t have adequate pavements and there are no safe cycling lanes connecting to nearby villages.

3. **Light pollution**: The development and lights will affect the views from Surrey Hills Area of Natural Beauty.

4. **Need?** With Brexit, migration will likely fall, so this will reduce the demand for housing. Brownfield sites should be built on first.

5. **Flooding and drainage**: The area is on flood plains and the current draining infrastructure cannot cope with the proposed extra houses. It is close proximity to the Thames Basin which has special protection. After perusing the developer Taylor-Wimpey’s social media page, I am not convinced that they will be able to cope with any drainage, flooding, or general construction issues. Please see below for screenshots of what has been posted by their very own customers on Taylor-Wimpey’s public social media page. This is only a small sampling of the complaints – please feel free to visit Taylor-Wimpey’s Facebook page, Trustpilot, and BBC Watchdog for the full impact of how this company operates. Please find some of the customer feedback below.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I was under the impression that the green belt only to be overturned in "exceptional circumstances". I feel that these exceptional circumstances need to be outlined clearly to the local community as I do not feel that this has been done. I also feel that the plan has not considered how the increase in population and traffic will affect the Sheepleas nature reserve and site of specific scientific interest. Should the proposed plan be accepted how would these concerns of mine be addressed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES A36-A41. Sites in East and West Horsley - I OBJECT

- Inclusion of Sites A36-41 (East and West Horsley). Whatever their merits as individual development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the villages of East and West Horsley.
- Building 533 new houses on these 6 sites, plus at least another 90 on small sites, including those in designated conservation areas is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities in the green belt. There are no specific "exceptional circumstances" to warrant the inset of these villages.
- The total number of homes in West Horsley will increase by 35%, (urban Ash and Tongham 16% and Guildford urban area only 11%) which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town centre itself.
- These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. EXAMPLE - Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Surrey County Council have no plans to investigate the statement by Guildford Council’s Education Review which says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan.
- The Raleigh School is already full and proposing to moved to one of the identified sites - causing years of disruption in and around the villages.
- The private Glenesk and Cranmore schools are also at or near to full capacity.
- The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away (see below).
- The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present.
- Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.
- Collectively, these 6 sites are at complete odds with NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an
amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. By surrounding Waterloo Farm campsite with 120 new houses,

- Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable.
- Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby.
- Additional housing will add to several hazards along this stretch of road (site A40), including: Its use by pedestrians, especially children (using the Raleigh and Glenesk schools and catching school buses to Guildford and Howard of Effingham)
- Site A37 is in a conservation area already and recent planning permission for a much smaller development on the same site was unanimously rejected by the planning committee on several grounds. This should be removed immediately from the local plan for exactly these specific reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5713  Respondent: 15571553 / Darren Carbine  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): ()

Site A35 - Three Farms Meadow site - I OBJECT

The continued inclusion in the plan of Policy A35 (land at Three Farms Meadow, the former Wisley airfield, Ockham). Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. Policy A35 should be removed immediately from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA)
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined
- Insufficient information about the impact on the local water table and run-off (see comments and attached pictures on flooding in Horsley above)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Flood.jpg](61 KB) [Flood2.jpg](101 KB)

Comment ID: PSLPP16/11488  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D2 - Sustainable design, construction and energy - I OBJECT.

Sustainability should be the overriding ambition of the entire local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11489  Respondent: 15571553 / Darren Carbine  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.

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers. The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.
POLICY H1 – Homes for all - I OBJECT.

It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. http://www.glhearn.com/developer/Pages/Overview.aspx: “We act for many of the leading developers.” G L Hearn is now part of Capita Real Estate. 7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: “I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. T

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): ()

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 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): ()
POLICY H2 – Affordable homes - I OBJECT.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11482  Respondent: 15571553 / Darren Carbine  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 policy states 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. 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: PSLPP16/11491  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1 - Infrastructure and delivery - I OBJECT.

Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. However, this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for. The plan targets greenfield sites – requiring heavy infrastructure investment, not a good or clever idea. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3
improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11492  Respondent: 15571553 / Darren Carbine  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.

Decisions by Highways England on improving the strategic road network (the M25 and A3) are years away. The Council have suggested a very expensive tunnel under Guildford, without any plans, designs or specifics. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11493  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 - Sustainable transport for new developments - I OBJECT

The policy fails in its primary task of guiding planning decisions. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths (see attached photos again). The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the
unfit and people carrying goods or shopping of any kind. The addition of two new stations will slow down train journeys, which are already slower than at any time since the 1930s.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11494  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY ID4 Green and blue infrastructure - I OBJECT.

The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11483  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty - I OBJECT.

This policy is dependent on the Surrey Hills Management Plan. The local plan welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. This is not in keeping with AONB national rules and regulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11484  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
POLICY P2 – Green Belt - I OBJECT.

This policy states, “the general extent of the Green Belt has been retained.” This is a blatant lie. The policy wording is lukewarm in support of the Metropolitan Green Belt even though the latter forms 89% of the borough. As noted under Policy S1 above, it is our provision to future generations. Once it’s 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. Building on green belt causes an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment & Flood control
- Biodiversity and wildlife.
- Natural heritage
- Room for public facilities such as parks
- Profitable film locations (e.g. Shere, Wisley Airfield)
- 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)

Specifically insetting 15 villages in the green belt (P2, 4.3.13) and assigning them to development that is “no longer considered inappropriate” (4.5.50) is a significant and unsustainable action that will have dire consequences for the character, infrastructure and future of all of these areas. See objections below in regards to Sites A36-41 in particular as a prime example. Indeed in the plan’s ‘reasoned justification’ regarding green belt, specifically section 4.3.18 it oddly states:

"Whilst most forms of development are considered inappropriate in the Green Belt, national planning policy lists certain exceptions which are not inappropriate. These are set out in paragraphs 89 and 90 of the National Planning Policy Framework. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land where it would not have a greater impact on the openness of the Green Belt.”

The plan specifically outlines that the most forms of development are considered inappropriate in greenbelt land - removing (or insetting as you call it) these villages does not alter the fact that it is contravening in every principle the guidance of the NPFF paragraphs 89 and 90 and limited in-filling of land is not reasonable to the tune of over 600 properties and a 35% increase in the size of the village of West Horsley - it is no way limited (green belt or inset).

This is in direct breach of conservative party manifesto commitments prior to the general and council elections of 2015 and contrary to previous responses to public consultations and specific government guidance on green belt provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11495  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**Green Belt sites - I OBJECT**

The identification and allocation of sites in this plan is with complete disregard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses. This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**POLICY P3 – Countryside (i.e. beyond the Green Belt) - I OBJECT.**

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is wrong.

Urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently.

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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POLICY P4 – Flood risk and water source protection zones - I OBJECT.

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. I have attached pictures taken of flooding on Ripley Lane, West Horsley, in June (yes June!) 2016, after two days of rain - this lane is symptomatic of the area around West Horsley, where there are proposed no less than 2500 homes inside a two mile radius. It is madness to think the environmental impact will be colossal caused by more run off and concrete.

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 P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P5 - Thames Basin Heath Special Protection Areas - I OBJECT.

This policy is weak. The compensation offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. 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?

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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): ()

POLICY S1 – Presumption in favour of sustainable development - I OBJECT.

At the top of the draft plan, Policy S1 ought to set a clear framework. Instead, there are no definitions of “sustainable development” given. Furthermore the policy fails to set out any principles for applying sustainable development in practice to local planning decisions. The worst gap in Policy S1 is the Green Belt. 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,

In my personal opinion Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11479  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 –Borough Wide Strategy - I OBJECT.

I have 4 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration.
2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. “West Surrey” is clearly far too small.
3. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.
4. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaims their pro-development agenda. External experts and members of the public have provided detailed critiques of the model. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2743  Respondent: 15571585 / Bradley Vaughan  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): ()
Transport:

[...]

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:

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Comment ID: PSLPA16/2742  Respondent: 15571585 / Bradley Vaughan  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 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:
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:

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: SQLP16/2116  Respondent: 15571585 / Bradley Vaughan  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): ()

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2749  Respondent: 15571617 / Bruce Garbutt  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

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 It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

Much of the Infrastructure is aspirational and uncommitted – it is not reasonable for other plans to be specific (eg house locations) and for the corresponding infrastructure to be

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2746  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I object to the SHMA on the basis that the population figures on which the whole plan is based are flawed. I object therefore to the figures and their validity.

Any education in statistical analysis would always warn against the perils of using an analysis over a short time period being used to produce projections over a long This appears to be precisely what has been done for the basic population forecast for this plan. I object strongly therefore to the consequent lack of validity of the SHMA. On the limited data shown (see (c) below), using a longer term base with similar methodology would give a materially lower figure.

This inflated forecast suggests that a positive policy of encouraging growth in excess of long term trends is being used although this does not appear to be explicitly stated anywhere as an actual The principal problems for me as a resident of Guildford concern the general inadequacy of the local infrastructure to cope with what exists today. The A3 is regularly now at a standstill for no reason other than the general weight of traffic; doctor and hospital services are overloaded, public transport outside the central conurbation is generally non-existent or incapable of meeting the needs of the current population trying to live at the 21st century pace of life. I object strongly therefore to any suggestion (stated or implied) of an intentional “go-for- growth-in-population” policy.

This highlights a fundamental problem with the whole of the SHMA analysis – the source of some raw data is defined but many of the modelling assumptions and also the model structures are not stated. The Council has refused to supply these assumptions and structures, claiming that they are commercially Given that the organisation that conducted the SHMA has commercial links to housing developers (as their website states, “We act for many of the leading developers and are currently advising on schemes totalling over 3m sq ft. We have a team of over 100 people directly involved in the development sector.”), I object strongly that all such assumptions and model constructs are not clearly visible to the public so that we can be satisfied that no undue developmental influence has been exerted on the results.

• I object that the results of the SHMA have been used unchanged by any practical constraints being
  • 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
  • This local plan has completely ignored these factors by using the raw SHMA figures for detailed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to each of the proposals to remove sites in this list from the Green Belt on the following grounds:

1. The identification and allocation of sites in this Plan is made 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 has received about individual sites ever since the Issues and Options consultation in 2013. The Plan has hardly changed since the Council received 20,000 objections to its first draft Plan in 2014. The Inspector considering the Plan may conclude that the consultation has not been properly conducted.

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the BREXIT referendum 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. The Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

1. Having properly applied constraints if 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: PSLPS16/5718  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the Gosden Hill development being in the Local Plan
- The land in Gosden Hill does exactly what the Greenbelt was designed to
  - It provides a green buffer between the Guildford Urban Area and West Clandon,
- It gives Burpham a defined green boundary and breathing space, and
- it hides Guildford town from visitors until they pass the off-slip to
  - No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the
  - Gosden Hill is the most obvious location for the north end of an A3 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 as presented could generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush
- 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
- No plans are shown for the necessary sewage, fresh water and power Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications.
- The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for What has changed?
- The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it
- 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

- 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 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5805  Respondent: 15571617 / Bruce Garbutt  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. Since the 2014 Draft Plan was withdrawn, the area under consideration has been enlarged in the direction of West Clandon.

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 slip road provision 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. The development will overburden the local road network and increase congestion on the 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 under 5m wide and too narrow for two lorries to pass causing them to mount the pavement (see also below).

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 is already under traffic stress (see also below) and which Surrey County Council say cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5719  Respondent: 15571617 / Bruce Garbutt  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)
  - 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 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?

- Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/5806  **Respondent:** 15571617 / Bruce Garbutt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A43 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 the Draft Plan 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 links. The bus service is infrequent and 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.

1. The site is susceptible to flooding and development will cause harm to the ancient woodland on and near the site. See my comment on Policy P4 above.

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 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.)
1. 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. (During the last week of the consultation period of this Plan, a resident of West Clandon had his car written off by a negligent car driver coming the other way and occupying 2/3 of the road at an obvious pinch point which is typically littered with broken wing mirrors.) 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. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for cyclists and pedestrians.

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. There is vague talk in the plan of link roads between Gosden Hill and Garlick’s Arch, all meeting at an enlarged A3 intersection at Burnt Common. The existing intersection is unlit and is accident prone. Adding two or three slip or feeder roads at this point will add to the confusion and public danger.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11510</th>
<th>Respondent: 15571617 / Bruce Garbutt</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 - Policy D3 - as a result of the scale of the proposed
- The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland including over 80 ancient oak trees adjacent to the
- The developments proposed will result in more traffic using the narrow roads in local villages and a further deterioration in the road Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development will only result in more traffic and more parking problems.
- Cycling has become an ever popular past time, particularly at weekends; hundreds of cyclists pass through the villages on the way to the Surrey With no proper cycle lanes on the narrow local roads 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.
- The narrow rural roads do not have proper pedestrian 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 risk of injury to the 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?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 - Historic environment

I object 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. Taken together with the current Council policy of “sweating assets” I fear this policy leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY D4 - Development in urban areas and inset villages

I object to this policy on the following grounds:

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, and the per person infrastructure investment can be reduced, e.g. fewer pavements, sewers, utility ducting per household than in the open countryside. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. Living in a town with good access to public transport reduces the desire for personal transportation.

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 disproportionately and is not sustainable.
POLICY E1 - Meeting employment needs

I object to this policy for the following reasons.

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 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.

1. The site is in any event subject to frequent flooding and contains ancient woodland and is unsuitable for development.

1. 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.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E2 - Location for new employment floorspace**

I object 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.

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): ()

**POLICY E5 Rural Economy**

I object to the loss of rural employment implicit in this draft plan. 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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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the leisure and visitor experience policy – Policy E6

• 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

• 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

• Guildford and the surrounding area has many “leisure and visitor attractions” The case for creating more is not made and no examples are given.

• 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 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 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: PSLPP16/11782  Respondent: 15571617 / Bruce Garbutt  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 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 attraction. 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?

Attached documents:

Comment ID:  PSLPP16/11783  Respondent:  15571617 / Bruce Garbutt  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 E7 Guildford Town Centre

I object to this policy on the grounds of its weak and ineffective wording.

- 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 explicit in the statement of 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 in, for example, several of the existing surface car parks which are not included in the Plan. 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, and ignores the trend towards increased on-line shopping from said 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, making shopping in Guildford a unique rather than repetitive experience. Above all, the retail development proposals must not damage the viability and historic attractiveness of the High Street.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
- **I object** regarding the inadequacy of the Homes for All policy – **Policy**

- Leaving aside the numbers issues (see 1-3 above), 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 (see above).

- **I support** higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial.

- 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

- Expansion plans by the University of Surrey should be adequately funded to include student accommodation for 100% of new students and should not simply rely on the Guildford area to make accommodation. The university campus has sufficient space for their necessary accommodation – they should not be preserving their environment at the expense of the surrounding area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
POLICY H1 – Homes for all

I object to Policy H1 for the following reasons:

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated. 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.

A much higher proportion of Surrey University students should be housed in university accommodation. The University has proved to be recalcitrant in providing accommodation in spite of outstanding Planning permissions. The policy does not do enough to rectify this.

I object to the numbers of Traveller pitches proposed to be included automatically and pro-rata without any demonstrated level of need in each location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11773  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes

I object to this policy on the grounds that 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. 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. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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. As I understand it, “affordable” homes are defined as those with a value of 80% of the market value. In a high house-price area such as Guildford, that still may not be truly affordable to many.

Paragraph 4.2.3 (in Policy H1) states that the SHMA has calculated that 70% of the affordable homes needed are 1 and 2 bedroom dwellings. In Guildford town centre there are at least 6 sites, covering around 2 hectares (5 acres), that are
derelict or used as surface car parks, some for decades, yet the Council appears to have had no success in redeveloping these at all. They have the potential to be used as mixed use town centre projects which could include apartment accommodation of this size. Not all of them are even included in the current Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11518  **Respondent:** 15571617 / Bruce Garbutt  **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 the Rural Exception Homes Policy – Policy H3

  - This policy is too widely cast stating in effect that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB).
  - Such homes are meant for people with a village connection but, as written, they could be for anyone on the Guildford Borough housing
  - To make the housing viable, or to improve the “mix”, this policy allows the inclusion of “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy therefore implies building anywhere and ignoring all historic planning
  - The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfulfilled, local need that cannot otherwise be 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:** PSLPP16/11774  **Respondent:** 15571617 / Bruce Garbutt  **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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POLICY H3 – Rural Exception Homes

I object to this policy for a number of reasons:

1. The wording of the policy is far too wide and ignores all other aspects of planning policy. As drafted the Planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

1. 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 proposed 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, regardless of whether more suitable locations were available. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

1. 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.

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 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.)

1. 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 and school children are expected to walk further than that before being eligible for free school travel.

1. 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. The supporting text includes this point, but it is not part of the policy itself and may carry little weight at appeal.

1. 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, and that developments should remain outside the open market in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11511  Respondent:  15571617 / Bruce Garbutt  Agent:
• I object to the lack of proper infrastructure planning for sites - Policy
  
  • Policy I1 requires the delivery of improvements to infrastructure in conjunction with I have grave concerns over the planning of the infrastructure requirements and that the relatively few projects identified will be implemented in advance of, or at the very latest, concurrently with the developments.
  
  • I have a concern that budget constraints, often outside the control of Guildford Borough, may well cause infrastructure to be seriously delayed or not even built at
  
  • Despite the Garlick’s Arch site (A43) being shown as a significant site for development, no infrastructure projects have been identified in the Infrastructure 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 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, the Merrow Park Practice and the East Horsley Medical Centre, will have their services stretched and 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 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 hospital - where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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.

With some 5,000 houses being proposed close to the villages of Ripley, Send and West Clandon, the roads serving the villages will become even more congested. Cycling has become an ever popular past time, particularly at weekends when hundreds of cyclists pass through the villages on their way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the villages and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the 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 to the public. In the case of West Clandon, the Street often only has a narrow footpath on one (alternating) side of the road making it very dangerous, especially when vehicles mount the pavements as some have to do in places in order to pass.

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. Implementation is critically dependent on providers outside the Council’s control and Community Infrastructure Levy income. This should be recognized as a key constraint but is not adequately taken into account. 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.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as many local doctors’ surgeries will have their services stretched and overwhelmed. Many of these services are already at capacity with waiting times of 2 weeks to see a GP. Any further development without funding will place further stress upon existing health services. There is no provision for increasing the capacity of the Royal Surrey County Hospital, Guildford. Where is this to be assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the remotely adequate plans for services and infrastructure and I object to the very severe impact that the proposed plans will have on the quality of life on the existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11512  Respondent:  15571617 / Bruce Garbutt  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 the proposed developments will cause to the trunk roads, A3/M25 - Policy

•  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 Highways England shows 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

•  The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11791  Respondent:  15571617 / Bruce Garbutt  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 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, and are beyond the command of the Council. 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.

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:

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**Comment ID:** PSLPP16/11502  **Respondent:** 15571617 / Bruce Garbutt  **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 dominance of the A3 corridor

There appears to be a disproportionate amount of development proposed along the A3 in the north east of the Borough - large housing at Gosden Hill, Garlick's Arch and Wisley Airfield amongst others.

These areas will effectively be providing dormitory accommodation either for Guildford or London. Residents in these areas would be relying almost exclusively for daily access and travel along the already over-congested

**I object strongly** that in all these cases the developments proposed in green belt will dwarf the nearby villages, totally changing the key attributes of the

Green belt was established to prevent urban sprawl with a clear policy that changes to the green belt should only be allowed in *exceptional* It is well established that the wish to build houses is not accepted as an exceptional circumstance. The fact that such building is being proposed on several places in the Borough clearly demonstrates that this is being viewed as a normal practice rather than as an exceptional circumstance. Such wholesale annexation of green belt is clearly against the wishes of the majority of the local population, is counter to stated government policy and is counter to the NPPF, if not in itself actually unlawful.

**I object** to the proposed resulting poor air quality - **Policy**

Paragraph 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 and greater levels of air This will have a detrimental effect on local residents and their health.

- **I object** to the dominance of the A3 corridor

  1. There appears to be a disproportionate amount of development proposed along the A3 in the north east of the Borough - large housing at Gosden Hill, Garlick's Arch and Wisley Airfield amongst others.
2. These areas will effectively be providing dormitory accommodation either for Guildford or London. Residents in these areas would be relying almost exclusively for daily access and travel along the already over-congested

3. **I object strongly** that in all these cases the developments proposed in green belt will dwarf the nearby villages, totally changing the key attributes of the

4. Green belt was established to prevent urban sprawl with a clear policy that changes to the green belt should only be allowed in *exceptional* circumstances. The fact that such building is being proposed on several places in the Borough clearly demonstrates that this is being viewed as a normal practice rather than as an exceptional circumstance. Such wholesale annexation of green belt is clearly against the wishes of the majority of the local population, is counter to stated government policy and is counter to the NPPF, if not in itself actually unlawful.

- **I object** to the proposed resulting poor air quality - **Policy**

- Paragraph 6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental 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 and greater levels of air pollution. This 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: PSLPP16/11513  **Respondent:** 15571617 / Bruce Garbutt  **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 proposed resulting poor air quality - **Policy**

- Paragraph 6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental 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 and greater levels of air pollution. This 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: PSLPP16/11775  **Respondent:** 15571617 / Bruce Garbutt  **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): ()

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I object to this policy as I am concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11508  Respondent: 15571617 / Bruce Garbutt  Agent:

I object that the plan does not protect the Green Belt - Policy

I object to the proposals to remove the sites of Gosden Hill, Wisley Airfield (A35) and Garlick’s Arch (A43) from the Green

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or for development on Green

There are no exceptional circumstances identified for these locations (as mere housing need does not constitute a ‘special circumstance’ for the land to be taken from the Green

Once taken the green belt is lost There is a real danger that the loss of this Green Belt will result in urban sprawl and local villages merging into one another.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11776  Respondent: 15571617 / Bruce Garbutt  Agent:
POLICY P2 – Green Belt

I object to this policy for the following reasons:

1. It 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. 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. 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.

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 brownfield sites.

1. 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 (a term which neither the Plan nor the NPPF defines) 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 a further 11. In effect, each village will become a nucleus for further development. The NPPF’s other four 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.
1. 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 intense 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.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” This is misleading. Since the Second World War, Guildford has been expanding to the north east, starting with the Bushy Hill estate in the 1950’s, then Merrow Park and Weybrook Park were built on around 100 hectares of Green Belt land in the 1980’s, and now 89 hectares of land from the adjacent Gosden Hill Farm is also to be taken out of the Green Belt. This will connect to the proposed Garlick’s Arch development (30 hectares), also in the Green Belt, via several slip roads and feeder roads alongside the six-lane A3 (a further 4.5 hectares). If allowed, these two proposals will more than double the area of Green Belt land hitherto removed to enlarge Guildford’s NE suburbs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/11506 | Respondent: 15571617 / Bruce Garbutt | 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 that the flood risk maps included in the Plan are out of date, they differ from those published currently by the Environment Agency and, in some cases, those shown are not supported by the flood data available from the Environment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/11509 | Respondent: 15571617 / Bruce Garbutt | 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 large scale development in areas which are at risk of flooding - Policy P4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11777  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4  Flood risk and Water Source Protection Zones

I object 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 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 the winter months and the flooding is made worse by the soil being heavy clay.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11507  Respondent: 15571617 / Bruce Garbutt  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 that the development proposed will not be sustainable - Policy S1

The development of 13,860 homes during the Plan period is not 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. 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 offering little option but to use cars for all transport (with the possible exception of Gosden Hill if a new railway station actually materialises).

Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure 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.

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11770  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 – Presumption in favour of sustainable development

I object to this policy. 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.” The policy calls for “development that secures the economic, social and environmental conditions in the area”.

As the first policy in the Plan, 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 in practice to local Planning decisions are given. However, apparently, all excursions into the Green Belt constitute “sustainable development”. Policy S1 fails to recognize that economic growth, social justice and environmental protection often conflict. It is clear that economic growth has trumped the other considerations in breach of the NPPF’s requirements.

Policy S1 is seriously deficient in omitting any mention of the Green Belt. It should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections as required by the NPPF. This would set 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” 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.

The policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.
I object to the scale of the overall developments

The above problems in the population numbers directly challenge the necessity for the scale and number of many of the developments proposed in the plan. As a result, many of the developments proposed are of a scale not in keeping with the environment in which we live and wish to maintain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY S2 –Spatial Development Strategy

I object to Policy S2 on a number of grounds:

1. Almost every element of the Plan is predicated on the OAN adopted as the housing number. 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. The algorithm used to calculate this number has been declared commercially sensitive and has not been revealed. I believe this number to have been seriously overstated before the BREXIT referendum but it is utterly without foundation now.

1. The number is based on a Housing Market Area (HMA): “West Surrey” comprised of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. “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, Haslemere, Reigate, Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

1. 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.

1. The OAN/housing number of 13860 is not as fixed as it would appear. The number of homes proposed, plus existing Planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. There are references in the evidence base documents to the possible need to make up shortfalls in Woking’s provision and the “Sustainability Assessment” carried out for the Council came up with a preferred figure of 15860 houses. It is unreasonable to embark on the most extensive transformation of the borough on the basis of an unclear housing target. The scale of the development proposed increases the onus for it to be seen to be sound.

1. The Plan in general and this policy in particular do not address the point that Guildford exists as part of London's commuter belt. In this area 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. “Affordability” is not a fixed sum but is dependent on market prices. The Plan will not reduce prices or increase affordability except at the margins. There is now recognition that in central London, where urban regeneration has transformed many districts and the term “inner city decay” is out-of-date, it is now the outer London suburbs that require regeneration. Over the period of the Local Plan, this process should be factored in to housing needs in areas such as Guildford, and could reduce the rate of outward movement from London.

1. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by topographic and infrastructure limitations. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). I believe the Council is under a duty to properly consider applying these constraints and that this has not happened. This approach differs from the other boroughs in Surrey. The Plan is based on the assumption that “growth is good”. More consumption, more congestion, more Green Belt being taken - this 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. There will be a significant increase in traffic flows along the A247 through West Clandon, funneling into several pinch points which are under 5 metres wide. Here, two lorries cannot pass without one mounting the pavement, along which young children are walking on their way to the village school. The edge of urban Guildford will be moved much closer to West Clandon. Guildford’s edge will be built on Green Belt land which was zoned 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?

Attached documents:

Comment ID: PSLPP16/11793   Respondent: 15571617 / Bruce Garbutt   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 outline I object to the number of houses being built in a relatively small part of the borough. I object to large parts of the green belt being built upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1404   Respondent: 15571617 / Bruce Garbutt   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: 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 take no account of the radically changed environment and outlook following the BREXIT referendum. This is hardly the fault of the Council but is nevertheless a serious flaw and requires a re-evaluation of the strategic context.
- The Transport Assessment was published at the same time as the Plan leaving little time for study and analysis. The projections contained appear to be quite inadequate in that 1) they average congestion over 3-hour time bands, which materially reducing the impact of congestion and 2) they do not model junctions.
- The “Assessment” shows that congestion will worsen significantly over the period of the Plan even if all the proposed and aspirational infrastructure is built.
• The Strategic Housing Market Need (SHMA) attempts to justify an Objective Assessed Need (OAN) based on a very aggressive desire for economic growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are opaque and have not been adequately scrutinized by Councillors. Consequently people have to take on trust the work of a consultant. In any case, political events have overtaken the SHMA.

• The number and complexity of the documents in the evidence base make reading, understanding, analysis and assimilation extremely difficult.

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 / Question 2: Legal compliance</td>
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<td>I object that the Plan is not legally compliant in that the modelling assumptions and structure have not been made available and therefore the SHMA does not comply with the Town and County Planning (Local Planning) (England) Regulations</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Question 2: Legal Compliance. This is surely a matter for legally qualified people. I am unable to judge whether the Proposed Submission Local Plan as a whole is legally compliant. Doubtless the Inspector and the legal representatives of parties to the hearing will decide this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: SQLP16/1386</th>
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<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): ()

I object that the Plan is not sound. It appears to be based on a wholesale annexation of the green belt, a flawed if not illegal strategy, and is clearly not deliverable in the timescales of the plan when compared with the typical rate of development in the last 10-20 years. 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 and impracticable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1406  **Respondent:** 15571617 / Bruce Garbutt  **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:

- “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
- The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
- The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB’s 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 National Planning Policy Framework (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’s and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified, together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.
- Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the BREXIT referendum.
- The housing number is at least double the achieved rate of building in the Borough over the last several years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
• Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag behind development and lead to much higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

• The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object that the Plan has not complied with the Duty to co-operate by the Council consistently refusing to provide the basis of the SHMA

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): ( )

Question 4: Duty to cooperate. There is no evidence on which to base a decision. This is a matter for an independent assessor to judge in possession of a fuller picture than has been revealed hitherto.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object that the Plan does not consider the overall and cumulative implications for the A247 of the large number of revised developments which have the potential to generate traffic on it, namely Gosden Hill, Slyfield, Garlick’s Arch, Burnt Common Industrial, Wisley and interchange changes at Burnt Common. This list should also include Surrey CC plans for the development of Newlands Corner but these don’t even appear in the revised Plan, despite the fact they are currently progressing through the planning process.

The A247, although historically classified as an A road, is already deficient in many respects having less than 2 vehicle width in places, no continuous footpaths, sharp bends, a hump-backed bridge with poor sight lines, dangerous junctions with the Station access and with the A3 southbound access slip-road and a primary school located in one of the narrowest parts.

In summary, the A247 is currently unsuitable for the current levels of traffic and quite clearly cannot cope with the additional traffic. It is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on this road over and above that in the 2016 draft to which residents strongly objected. Despite the previous objections, there is still 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. I object that this deficiency makes many of the above proposed development unsustainable.

I object regarding policies ID1 and ID2 (Infrastructure)

Although much more is made in the revised plan about the need for new infrastructure to support the various developments and for this to be in place when needed, little real detail is provided as to what will be done and how it will be funded.

The Plan admits …”we forecast that there will also be an absolute increase in overall traffic volumes…” and this is assuming all the infrastructure (listed in App C to the Plan) is in place in a timely fashion.

GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed. In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and /or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers. 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. 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.

I object that 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.
I object strongly that in all these cases the developments proposed in green belt will dwarf the nearby villages, totally changing the key attributes of the area.

Green belt was established to prevent urban sprawl with a clear policy that changes to the green belt should only be allowed in exceptional circumstances. It is well established that the wish to build houses is not accepted as an exceptional circumstance. The fact that such building is being proposed on several places in the Borough clearly demonstrates that this is being viewed as a normal practice rather than as an exceptional circumstance. Such wholesale annexation of green belt is clearly against the wishes of the majority of the local population, is counter to stated government policy and is counter to the NPPF, if not in itself actually unlawful.

I object that the Plan makes no attempt to show any exceptional circumstances to justify the removal of any sites from the Green Belt.

I object that the Plan is not sound. It appears to be based on a wholesale annexation of the green belt, a flawed if not illegal strategy, and is clearly not deliverable in the timescales of the plan when compared with the typical rate of development in the last 10-20 years.

I object that the revised Plan shows little or no evidence of the required “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 will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of local residents.

There is a serious lack of detail on these critical matters which makes any collective vision impossible – for example, no plans for the A3 between the M25 and Guildford, a main artery which is already overloaded before any of the proposed thousands of additional houses are built. I object that the thousands of previous comments seem to have been largely ignored.

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 SHMA on the basis that the revised population figures on which the whole plan is based are flawed. I object therefore to the figures and their validity.

a) Any basic education in statistical analysis would always warn against the perils of using an analysis over a short time period being used to produce projections over a long period. This appears to be precisely what has been done for the basic population forecast for this plan. The revised figures are therefore inherently unreliable.

b) This inflated forecast suggests that a positive policy of encouraging growth in excess of long term trends is still being used although this still does not appear to be explicitly stated anywhere as an actual policy. The principal problems for me as a resident of Guildford concern the general inadequacy of the local infrastructure to cope with what exists today. The A3 is regularly now at a standstill for no reason other than the general weight of traffic; doctor and hospital services are overloaded, public transport outside the central conurbation is generally non-existent or incapable of meeting the needs of the current population trying to live at the 21st century pace of life. I object strongly therefore to any suggestion (stated or implied) of an intentional “go-for-growth-in-population” policy.

c) This version of the Plan does include more information than the previous version regarding the modelling assumptions and also the model structures; however full disclosure has still not been made. Given that the organisation that produced the revised forecast has commercial links to housing developers (as their website states,”We act for many of the leading developers and are currently advising on schemes totalling over 3m sq ft. We have a team of over 100 people directly involved in the development sector.”), I object strongly that all such assumptions and model constructs are still not clearly visible to the public so that we can be satisfied that no undue developmental influence has been exerted on the results in areas where modelling detail has been produced, it is obvious that sections of the calculations have been based upon different originating data and assumptions thereby making the overall calculations erroneous, false and inaccurate. I object therefore that no credence can be put on the overall results given this basic statistical invalidity.

I object to the scale of the overall developments proposed. The above problems in the population numbers directly challenge the necessity for the scale and number of many of the developments proposed in the plan. As a result, revised developments proposed are of a scale not in keeping with the environment in which we live and wish to maintain. I object that the new results of the SHMA have been used unchanged by any practical constraints being applied.

• 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 has completely ignored these factors by using the raw SHMA figures for detailed planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the dominance of the A3 corridor developments.
a) Following the removal of the originally proposed developments in Normandy, the revised figures show an even more disproportionate amount of development proposed along the A3 in the north east of the Borough - large housing at Gosden Hill, Garlick's Arch and Wisley Airfield amongst others.

b) These areas will effectively be providing dormitory accommodation either for Guildford or London. Residents in these areas would be relying almost exclusively for daily access and travel along the already over-congested A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2748  Respondent: 15571649 / Sian Folley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write as someone who has lived in West Horsley my entire life to register a strong protest against the proposal of Guildford Borough Council to remove Green Belt status from West Horsley and East Horsley. The introduction of an estimated 35 per cent new homes in West Horsley alone would irreparably alter the character of the village and is, for the reasons I will enumerate below, an incredibly ill-thought out scheme.

The scale of this plan is unsustainable for a multitude of reasons:

- I wholly object to the unwritten expectation that all the villages on the A3 corridor will, sooner rather than later, become an urban sprawl linking this area to the suburbs of south west London.

- Our environment is attractive and of national importance for flora, fauna and geographical issues.

- The importance of maintaining the Green Belt to prevent the urbanisation of Surrey’s rural communities, like West Horsley and East Horsley, is paramount. Our legacy should not be to leave behind a landscape to resemble a concrete jungle – which I fear will be the consequence of the scale of the proposal drawn up by Guildford Borough Council.

- If we are to protect the Green Belt for future generations we need to ensure it is only lost after strict examination against laid down criteria and after all suitable Brown Field sites are fully utilised.

- Our concern about the Cayman Island registered company's promotion on the former Wisley Airfield will have unimaginable and irreversible consequences on all the villages surrounding the site, obviously including West Horsley.

- It is incumbent on the Local Plan that the unsatisfied demand for housing is established as a genuine local demand for people born it the locality, or who need to live in the locality as a consequence of their local employment; or are existing residents needing to downsize or upsize.

- In West Horsley, we have watched a succession of smaller, and therefore ‘affordable’ properties, be granted planning permission by the Guildford Borough Council allowing them to be rebuilt into substantially larger, and therefore hugely more expensive homes. Where has the coherent thinking been behind that policy?
• The infrastructure is already at capacity. Our roads, through West Horsley and East Horsley, are congested at peak times of the day since commuter and school traffic has become significantly increased in recent years.

• Traffic increases from the proposed new housing estates will exacerbate an already critical overload of cars in the village.

• This congestion then spreads to all the adjacent roads. Furthermore, the state of these roads, and all others within the two villages, are narrow with poor or limited paving. In places, in West Horsley, there is barely room for two four-by-four vehicles to pass; and the presence of trucks, which are seen with greater frequency as our villages are used as cut-through between the A3/M25 and the A246 Guildford-Leatherhead road, causes traffic to slow to a halt. This is also placing pedestrians at risk.

• Also, there are several points in East Lane, in West Horsley, that are repeatedly flooded through the winter. In essence, the pressure on our roads and drainage is at a worryingly fraught level today.

• Erosion of verges and ditches is already a threat caused by flooding and unusual weather patterns of late. The effect of concreting over the Green Belt land will further reduce the natural drainage system and drive water into existing drains that are already at risk of overflowing.

• Parking is already an issue, too. The station car park, serving both villages, is almost full on most days from Monday-Friday. Parking at the three parades of shops is also regularly overloaded.

• The Raleigh School in West Horsley is full with no room on the site for expansion. The Howard of Effingham Secondary School, traditionally the school that children from West Horsley transfer to at the appropriate age, is also at maximum capacity.

• At school times, when parents deliver or collect their children from the Raleigh Primary School, or the preparatory schools, Glenesk and Cranmore, it is not an exaggeration to describe East Lane, Ockham Road, Northcote Road, Northcote Crescent and Nightingale Crescent as chaotic. It does not bear thinking about how much worse these roads would become in the event of an influx of housing on the scale being considered.

• The Horsley Medical Centre is operating at what appears to be maximum capacity – again parking to keep an appointment at the surgery is already a game of chance. Like the local schools, the Medical Centre has limited scope, or no scope at all, for building development and is at full capacity.

A traditional village life has been maintained throughout my 29 years living in West Horsley; with strong clubs and associations—most of which I have been a part of from my childhood until the present day—as well as an abundance of local businesses, and producers of food local to the area.

There is limited employment within the Horsleys, and the bus service is one designed to meet the needs of ageing, rural community inhabitants; not those seeking to work in Guildford or Woking, for example. The rail service is already heavily used throughout the week – and the railway station is substantial distance from much of the housing in West Horsley.

It is the duty of our generation to maintain the natural beauty – and significant importance – of villages like West Horsley for the generations of the future. We think we are doing a decent job of that. After all, history has shown that the constructions of 1960’s style development of cheap housing created more problems in rural areas than it solved: rising crime, unemployment, and communities without a soul.

Once farmland has been commissioned for development, we have arrived at a point of no return.

This plan destroys the very essence of Surrey – so attractive not only to those of us living here in West Horsley, but for those that relish the chance to visit and enjoy the Green Belt that has been part of our heritage for a century.
I repeat: this Local Plan proposed by Guildford Borough Council is inappropriate and should be condemned for the damage and destruction that would be wreaked upon West Horsley killing a village that is vibrant, well-maintained and cherished by those who live here.

Yours sincerely,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2750  **Respondent:** 15571681 / Anne Martin  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5721  **Respondent:** 15571681 / Anne Martin  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)
Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5720  Respondent: 15571681 / Anne Martin  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 significant problem 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11521  Respondent: 15571681 / Anne Martin  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. If this were to be destroyed it would never be replaceable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11523  Respondent: 15571681 / Anne Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)
There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11524  Respondent: 15571681 / Anne 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): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11525  Respondent: 15571681 / Anne Martin  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: PSLPP16/11522 Respondent: 15571681 / Anne 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): ()

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: PSLPP16/11516 Respondent: 15571681 / Anne 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): ()

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 which will again destroy the rural character of this area.

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:** PSLPP16/11515  **Respondent:** 15571681 / Anne Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to development in areas which are at risk of flooding (Policy P4)</td>
<td>The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11519  **Respondent:** 15571681 / Anne Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</td>
<td>The large number of new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Cland and very much change the rural character of these villages as well as increasing road traffic.</td>
</tr>
</tbody>
</table>

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)
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: PSLPA16/2751  Respondent: 15571745 / Hazel Thompson  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: PSLPA16/2752  Respondent: 15571745 / Hazel Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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 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: PSLPS16/5722  Respondent: 15571745 / Hazel Thompson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land 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) especially when there are suitable sites in brownfield areas that could be developed.

The Plan states the preference is to making the best use of previously developed land. Yet two weeks before the start of consultation a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses and the industrial provision, 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. 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. 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 such a late stage no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11532  Respondent: 15571745 / Hazel Thompson  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: PSLPP16/11530  Respondent: 15571745 / Hazel Thompson  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 industrial, storage and distribution should not be at Garlick’s Arch (A43) but on the site to the south of the site at Burnt Common where 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11531  Respondent: 15571745 / Hazel Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

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. This certainly does not meet the ‘exceptional’ criteria required to build on the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11534  Respondent: 15571745 / Hazel Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object 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 such as Polesden Lane. 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11535  Respondent: 15571745 / Hazel Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. Despite the Garlick’s Arch site (A43) being proposed as 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 and there will be inadequate infrastructure for the residents in the proposed housing.

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.

Ripley and Send schools are now also at full capacity and would require expansion or additional schools being built. There is also no secondary schooling available for children of Ripley, Send and Clandon without sizable commutes by car due to lack of bus service provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11536  Respondent: 15571745 / Hazel Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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.

Furthermore, if Highways England had identified a need for an additional entrance/exit for the A3 near Ripley, they would compulsorily purchase the land required to do so in the best location. They have not done this, nor identified Garlick’s Arch as a site to use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11528  Respondent: 15571745 / Hazel Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to 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. 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 which is a greenbelt site, it would seem pertinent and sensible to develop brownfield sites wherever possible. The Burnt Common industrial estate just south of the Shell garage is keen to develop its land further and to make the most of the already partially developed land. Just two weeks before the start of the consultation the plan had been to develop this area, to which I’m sure there would have been much less public objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11529  Respondent: 15571745 / Hazel Thompson  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 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. The assessment made needs to be reassessed. Furthermore, large parts of Ripley and Send are in or next to flood zones, further building in the area would increase flood risks due to the reduction in run off areas and fields to absorb water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11526  Respondent: 15571745 / Hazel Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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 volume and location of homes proposed is not sustainable. It will have a detrimental effect on the environment and existing 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. This will further increase the number of cars and associated congestion in the area. The plan does not propose adequate infrastructure and road provision to accommodate the unnecessarily large number of homes to be built. There are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11527  Respondent: 15571745 / Hazel Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered and the approach differs from all other Borough Councils in Surrey. 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.

The Plan proposes 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. The proposed development will result in a merging of identities of the villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough which 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: SQLP16/1388  Respondent: 15571745 / Hazel Thompson  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 understand that development is needed and housing needs to be increased. However this needs to be done in a considered way that takes account of current communities, the environment, the sustainability of development and reflects the nature of the area. The proposed Local Plan does none of these. The last minute amendment of the plan to include the Garlick’s Arch area is the most prominent of these. It is imperative that the local plan is reassessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5727  Respondent: 15571905 / 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. No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. 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 expect few of these homes will be truly affordable to local residents and will lead to a further influx from surrounding areas and out of London and thus not meet the requirements of the local population. Rather than the families of local residents being housed, there will even more crowding in the area.

• 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. 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. Residents will need to visit nearby shopping centres and will almost all rely on private transport. 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. The situation would be impossible during the construction phase which could last for several years.
  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). The increased congestion on the road is likely to make car drivers even more frustrated and even more of a risk to cyclists and pedestrians.
  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). In addition, such a large development will have a major impact on views from surrounding beauty spots.

- 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.

- Finally, I object to the loss of agricultural farmland in the area. Several farms within the Borough have already been subject to development. The continued erosion of the area’s rural heritage is a significant loss to borough.

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: PSLPA16/2759  Respondent: 15571937 / S Bennell  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: PSLPA16/2761  Respondent: 15571937 / S Bennell  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: PSLPA16/2763  Respondent: 15571937 / S Bennell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5735  Respondent: 15571937 / S Bennell  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 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:**

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLS16/5737</th>
<th>Respondent:</th>
<th>15571937 / S Bennell</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11583  Respondent: 15571937 / S Bennell  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: PSLPP16/11599  Respondent: 15571937 / S Bennell  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: PSLPP16/11602  Respondent: 15571937 / S Bennell  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.
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the location for new employment floorspace (Policy E2)</td>
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<tr>
<td>I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</td>
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<tr>
<td>Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.</td>
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<tr>
<td>There is no need for the new employment floorspace to be located at Garlick’s Arch 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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<th>Comment ID: PSLPP16/11581  Respondent: 15571937 / S Bennell  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<th>I OBJECT to the loss of rural employment (Policy E5)</th>
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<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
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<td>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): ()

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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<tr>
<th>Comment ID: PSLPP16/11596</th>
<th>Respondent: 15571937 / S Bennell</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11591  Respondent: 15571937 / S Bennell  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: PSLPP16/11593  Respondent: 15571937 / S Bennell  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 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: PSLPP16/11605  Respondent: 15571937 / S Bennell  Agent:
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: PSLPP16/11587  Respondent: 15571937 / S Bennell  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: PSLPP16/11589  Respondent: 15571937 / S Bennell  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: PSLPP16/11572  Respondent: 15571937 / S Bennell  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11575  Respondent: 15571937 / S Bennell  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: PSLPP16/11568  Respondent: 15571937 / S Bennell  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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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1391  Respondent: 15571937 / S Bennell  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: SQLP16/1393  Respondent: 15571937 / S Bennell  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: SQLP16/1395  Respondent: 15571937 / S Bennell  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:
Do you consider this section of the 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.
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:** pslp172/4702  **Respondent:** 15571937 / S Bennell  **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: pslp172/4703  Respondent: 15571937 / S Bennell  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:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp17q/632</th>
<th>Respondent: 15571937 / S Bennell</th>
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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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<th>Comment ID: PSLPS16/5729</th>
<th>Respondent: 15572033 / Susan Wiera</th>
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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.

3 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>Respondent: 15572097 / Jackie Wybrow</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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1. I object to the building of 45 houses at Clockbarn Nursery - there is already a high volume of traffic and the roads cannot take any further traffic. The roads are particularly windy and very dangerous to all road users. By building additional properties this will compound the existing issues with dire consequences.
2. I object to the building of 400 houses and 7000 sq ft of industrial space at Garlick's Arch. This is in the greenbelt area and there are definitely brown belt sites in the area that are ripe for development and would keep the green belt in tact. I also understand that the requirement for housing in the Guildford area is not as high as has been specified.
3. I object to the development of 40 houses and 2 travellers' pitches at Send Hill. Already there is too much traffic travelling at speed along Potters Lane which has resulted in the deaths of numerous domestic pets and near misses by those on foot or on push bikes. By building on Send Hill the problem would be exacerbated. The site is contaminated as it is full of unsafe landfill which has been documented and there should be a duty of care by the builders to ensure they are offering homes for sale on safe land. This is in area of natural beauty and by building on this site the natural beauty will be destroyed.
4. I object to the a new interchange with the A3 at Burnt Common as this would increase the amount of traffic flowing through Send during the busy commuter hours and the streets are already gridlocked during these times so adding more traffic will compound the problem. I am very concerned about the increased levels of noise and air pollution that this increase in traffic will cause for the residents of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5730</th>
<th>Respondent: 15572097 / Jackie Wybrow</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5733  Respondent: 15572097 / Jackie Wybrow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the building of 400 houses and 7000 sq ft of industrial space at Garlick's Arch. This is in the greenbelt area and there are definitely brown belt sites in the area that are ripe for development and would keep the green belt in tact. I also understand that the requirement for housing in the Guildford area is not as high as has been specified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5739  Respondent: 15572097 / Jackie Wybrow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the a new interchange with the A3 at Burnt Common as this would increase the amount of traffic flowing through Send during the busy commuter hours and the streets are already gridlocked during these times so adding more traffic will compound the problem. I am very concerned about the increased levels of noise and air pollution that this increase in traffic will cause for the residents of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5738  Respondent: 15572097 / Jackie Wybrow  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. Already there is too much traffic travelling at speed along Potters Lane which has resulted in the deaths of numerous domestic pets and near misses by those on foot or on push bikes. By building on Send Hill the problem would be exacerbated. The site is contaminated as it is full of unsafe landfill which has been documented and there should be a duty of care by the builders to ensure they are offering homes for sale on safe land. This is in area of natural beauty and by building on this site the natural beauty will be destroyed.

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>15572225 / Rob White</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

By the way what are the assumptions for the figure for 13,860 additional homes by 2033. Also what will be the impact of Brexit on this figure?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/11611</th>
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<tr>
<td>Document:</td>
<td>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. Yes we need housing, especially affordable housing for the local youth and lower paid workers, but these aren't the properties that appear to be being developed.
   1. What is the current waiting list for guildford council housing needs
   2. Will these (and more) be catered for by the local plan
   3. What about affordable housing as it would appear that developers are not necessarily meeting their obligations or are able to circumvent them

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11608  Respondent: 15572225 / Rob White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan:

1. The infrastructure needs to support the local plan do not appear to exist.
   1. How can you add all these houses without having the road, school, surgeries, dental practices and hospital capacity to support the added load?
   2. It already takes me an hour (or more) to get to the Royal Surrey from Merrow for appointments if at the wrong time of day and during term time, it can take up to 30 minutes just to get to the Spectrum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11612  Respondent: 15572225 / Rob White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building on the green belt as a matter of principle and the Hogs Back for ever ruining Guildford for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11609  Respondent: 15572225 / Rob White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I notice no where in the plan do you mention the population per sq km for Surrey as it is and will be and compare that with other counties.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/907  Respondent: 15572225 / Rob White  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): ()

University of Surrey

Have the people of Guildford ever been asked if they are happy with the expansion of the University of Surrey? No.

As it grows it is just adding further pressure on the housing stock within Guildford, so stop any further expansion without consulting the people of Guildford as to whether they are happy with it and explain the impact of that development.

The University should be housing the majority, at least 80%, of its students within the campus and base any expansion on being able to achieve this.

Before you start saying they bring employment to the borough, I would disagree. I spent 40 years in the IT industry from 1976, when I trained at Guildford Tech, until this year and I never saw any opportunities from the University or the companies around the hospital. What I did see suggested that the recruitment was being done in India as was becoming common across business from the early 2000s. In all my time in the industry I only met 1 person that had ever worked for a company based up near the hospital and university.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11610  Respondent: 15572257 / Rosemary Cornford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with 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 boundary change to move the settlement boundary westwards from the houses on the west side of Kingston Avenue to the tree line running along the parish boundary on the west edge of of Kingston Meadows which would result in taking all of Kingston Meadows out of the green belt.

I have lived in my house since October 1979 and daily walked in the Meadows with my dogs. When GBC bought the Meadows, renaming them Kingston Meadows, we were assured by GBC that they would forever be used as recreation area for the residents of East Horsley. A large circle of Whitebeam trees was planted at the far (south) end of the Meadows and we were told the land there was to be used by locals to freely roam, picnic, exercise, walk children and dogs etc.

Subsequently the children's play areas, tennis courts, football pitch and so on were built, all plainly for use by villagers.

No sound reasons have been given for the proposed extension of the boundary, which seems to be aimed solely at increasing the land available within the settlements for future additional development. Moving the green belt boundary westwards does not constitute an 'exceptional circumstance' under the NPPF rules and as such I believe this to be an invalid proposal.

Therefore I OBJECT TO THIS PROPOSED BOUNDARY CHANGE.

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): ()

If houses have to be built locally they should first be made available for local people so that family ties and friendships can be maintained, helping to build social cohesion. Sadly, this has not happened in Cranleigh where new housing has been offered to people from the other side of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11614</th>
<th>Respondent: 15572353 / Dianne Kashel</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): ()

A huge increase in population will put great pressure on existing services including education, medical care and sewage disposal. Doctor’s appointments are already difficult to come by unless it’s an emergency and school places are no longer readily available for local families. We only need one sustained downpour for roads to be flooded and the Thames water crews to be out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11613</th>
<th>Respondent: 15572353 / Dianne Kashel</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</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 also object to the loss of green belt land for building purposes on the grounds that there has been a clear government directive that brownfield sites should be used first. Brown field sites should be used for housing not just for proposed business use. At the same time, having looked at the aerial views of Dunsfold park there is a lot more greenfield land than brown field land there and I hope that this would be preserved for environmental and recreational reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/11616  Respondent: 15572353 / Dianne Kashel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 is an attractive, green leafy place to live in which of course makes it very popular. Excessive development will transform this haven for the worse and it will eventually just become another suburb of London. I hope these plans can be modified so that the impact is less destructive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5740  Respondent: 15572449 / Neil Titley  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.

2) 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My objections are as follows:

• 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 strongly 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 Council has allowed many existing houses, which would be ideal for first time buyers and those with families, to be turned into houses of multiple occupation, in order to house students, who make no contribution to Council Tax, and who are a wholly transient population. The University should be made to house their students in Halls of Residence within the purlieu of its own considerable land holdings, thereby releasing much needed housing stock.

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
  7. **Guildford BC has foolishly encouraged the influx of a large and increasing number of “leisure” cyclists into the Horsleys, who block the roads every day of the week, hold up traffic (increasing air pollution) and impede residents from efficiently going about their everyday business.**

• 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:

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Comment ID: PSLPA16/2767  Respondent: 15572481 / Jacqui Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to Send Village being removed from the Green Belt. There is no justification for abandoning the Green Belt framework and its rationale; nor for the breach of pre-election promises. Abandoning Send's Green Belt status will inevitably be the first step in Woking and Guildford becoming one rambling and unacceptable conurbation

2. **I OBJECT** to building 45 houses at Clockbarn Nurseries. Our access on to Send Road is from Sandy Lane, opposite Tannery Lane: this is a difficult and dangerous junction at the best of times; and things will be made worse by this additional building

3. **I OBJECT** to the proposed development at Garlick's Arch. The site floods and is covered by ancient woodland. The proposed industrial development is not required in this Green Belt site

4. **I OBJECT** to the development of 40 houses and 2 travellers' pitches at Send Hill. This is a highly inappropriate location in a high amenity area of beautiful countryside

5. **I OBJECT** to the new interchange with the A3 at Burnt Common. This will inevitably increase the traffic, pollution etc in Send Road. We have already experienced on a couple of occasion in recent years when other local road repairs have forced traffic to use Send Road how severe these problems can/will be

The proposed developments will destroy the fabric of Send, and hence my strong objections to all of them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5744  Respondent: 15572513 / Mike Rushby  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 indeed is more than double the figure used in previous plans.

- I object to the disproportinate 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
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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 (SNCl).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I 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: PSLPA16/2769  Respondent: 15572577 / Jennifer Ratnayaka  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 Send and Ripley villages being removed from the green belt. The green belt is really important for and once it is gone it's gone. It's really important to me to protect our green belt and our countryside, it's so important to the environment and for visitors to the area. We really must protect it and minimise development in the area which cannot be undone. The national planning policy framework says that the green belt should be permanent. Local councillors gave clear election promise to protect it and this is because it is so important to those who live here and beyond.

I OBJECT to the development at Send Hill which would ruin the countryside in this area. The roads cannot take more traffic, the lanes are narrow and bendy and already take many fast and noisy cars, it wouldn't be suitable to have more homes here.

I OBJECT to the building of 400 houses and 7000 sq metres of industrial space at garlicks arch. Please use brown field sites before looking at destroying the ancient woodland here.

The above proposed developments could also cause big issues in terms of heightened flood risk and more dangerous roads. It's really important to me to protect our green belt. As a recent first time buyer I appreciate the struggle faced by many trying to buy their home but even through the toughest searches I always stood strong that the green belt MUST be protected, that is the whole point of the green belt! If any exceptions are made them it will kick start the motions for many more developers and there is no way to reverse the damage. Our countryside, trees and wildlife is what makes our area so special.

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 strongly object to the ruination of this most beautiful local area which is steeped in history and is the breeding ground for many Precious species of wildlife. I have lived nearby in Cobham for over 50 years and now visit my daughter and son-in-law who live in Ockham with their three grandchildren. They adore the wonderful atmosphere of peace and calm which this green belt area was specifically designed for. What a terrible tragedy to lose the countryside that allows people walk and cycle in fresh air and prevent depression overtaking our lives in these times of stress and fear in a troubled country.

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:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5747  Respondent: 15572641 / Susan Palmer  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)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11620  Respondent: 15572641 / Susan Palmer  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 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.

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: PSLPP16/11619  Respondent: 15572641 / Susan Palmer  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 West Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become a hugely 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 II)

   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.

   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.

   1. **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.

   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.

   Again the infrastructure required does not seem to have been address in the plan.

   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.

   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: PSLPP16/11618  Respondent: 15572641 / Susan Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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.

The whole point of “Green Belt” is to provide a buffer from the continual pressure of urbanisation. We must protect these areas for the future, they were created for a reason and that principle is now more than ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11617  Respondent: 15572641 / Susan Palmer  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 development of thousands of homes in the villages to the north of Guildford 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.

Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable infrastructure 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:** PSLPA16/3146  **Respondent:** 15572705 / Kate Dann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the scale of the proposed building expansion on green belt land in Normandy, labelled A46/A47 on the strategic plan.

As a resident of Normandy for more than 40 years I treasure the rural aspect that harbours ancient woodlands, protected species, charitable enterprises and provides an oasis of calm traditional countryside that serves the 3 sizeable towns that surround it – Guildford, Farnham and Aldershot. The footpaths and woods are well used by walkers who use the short train journey from the above towns to reach and enjoy open countryside.

I do recognise the need for the provision of more varied housing, not only to fulfil the needs of the strategic plan but also to keep the village vitalised, but this should not be at the expense of the preservation of our green belt and the swamping of the existing village and residents. We do not need an extensive retail space as there are several in the area plus small supermarkets. We already provide space for fairground storage and travellers’ accommodation, more of which are included in the plan which seems excessive.

The proposed development would more than double the housing stock in the village. Once this land is built on it will forever change the environment and character of the area and we will be left with one big urban sprawl. We should protect the spaces we have and look to infill in already developed areas or build small contained developments that will enhance the environment instead of destroying it.

- The infrastructure cannot support this plan in any way. The village is sandwiched between the A31 and A323, two small country lanes, Wanborough Hill and Glaziers Lane connect these 2 roads. They also also serve the A3 and provide an access route to the M25, Blackwater Valley Route and M3. If anything unusual happens on these roads, such as road works, accidents, floods, the whole village becomes gridlocked as traffic attempts to find alternative routes. So a large part of my objection is based on the fact that our roads could not support the traffic from another 1000+ houses, and there seems little scope for altering these in any significant way.
- The proposed land for the development is green belt land. It is proposed that by building a secondary school this would override the protection that this status offers it. There is no proof that a school is needed in this area as the local schools are NOT fully subscribed. Incoming students from outside the area would create more traffic on already overcrowded roads. There is an argument that the train station would provide a good transport link for both commuters and students but the cost of train tickets, especially for a family with more that 1 child, are prohibitive.
• I have no technical knowledge but from walking the footpaths, woods and fields for the last 40 years I know how soggy and wet the ground all around is, even in the summer time. This does not bode well for the developments. How will the ground water round the buildings be dispersed and how will the environment be affected by the extra ground works that will be needed to service the needs of the housing. Will you be building houses that in the future will be white elephants as they could be uninsurable or unsustainable due to flood/water threat.

• A final point is the disruption that such sustained building would make on the area for several years, with heavy works vehicles that would put additional strain on small country lanes and overcrowded local roads and cause distress and inconvenience to the local community should the development as proposed go ahead.

To sum up I believe that this development as proposed is led not by the need of the community, either local or wider, but by greed of a few developers.

The council should try a more imaginative and sustainable plan and I object to the plan as proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11621  Respondent: 15572737 / Bryony Purse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the 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 removal of the greenbelt protection from Chilworth and Shalford and Peasmarsh.

This would allow the Guildford area to become a sprawling suburban development and would not be good for the rural environment.

This is some of the most scenic country and well farmed, productive and used land. Allowing building in this area would be an end to this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7641  Respondent: 15572801 / Kathy Kirk  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 (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: PSLPP16/11623  Respondent: 15572801 / Kathy Kirk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 to build so many homes on the Green Belt. It will irreversibly spoil what is currently an incredibly beautiful part of our English Countryside. I urge that these plans be reviewed and be significantly watered down or abandoned altogether.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5748  Respondent: 15572833 / Karl Penn  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): ()
My over-riding concern is that existing properties in areas such as ours are being told repeatedly by Council offices and SW Water that the threat of flooding is because of developments and the lack of / upgrading of infrastructure and drainage services to support those projects.

More specifically:

- The proposed removal of the Former Wisley Airfield from the Green Belt. The development proposal is creating infill of green belt areas and that has already been abused with the M25 services at Cobham. There are surely areas that require regeneration rather than developing new ones, or over populating areas such as Ockham and Ripley.
- We first moved to the Cobham area in 1987. The increase and impact of transport – both in terms of volume, and size – is staggering. Look at the weight of traffic which travels along Plough Lane – with cyclists! There is already sever congestion because the road systems are inadequate and an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development. These are old villages and hamlets which supported by infrastructure never intended for modern day living. There can’t be development with improvement in infrastructure.
- I’m a dog walker – and there is a genuine risk to pedestrians, dog walkers, and cyclists from the increased traffic volume.
- There are environmental concerns which relate to the above, and as I understand, air pollution 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 – or perhaps Brexit means that can be ignored!? In addition, what about wildlife and the changes to / loss of natural habitat.

The application shouldn’t be considered without a full impact study, and a huge dose of common sense. This is not nimby’ism – these are genuine concerns about the area I live which is rapidly under threat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5750</th>
<th>Respondent: 15572897 / Stephen Johnson</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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Following review of material published on the GBC New Local Plan website and my attendance at a recent meeting of the Burpham Community Association held as part of the consultation process, I wish to register my strong opposition to the plan as it is currently framed.

I find the overall plan long on ‘aspiration’ but woefully short on practical details: however, as a resident of Burpham I intend to concentrate on one issue, specifically on the plan to build 2,000 houses on the Gosden Hill Farm site. This development impacts on all policies (except for numbers 5, 9 and 11) detailed in the Evidence Base but, again, I will concentrate on one aspect, namely transport infrastructure, because all the other policies are predicated on this single item.

According to the most recent ONS Neighbourhood Statistics, Burpham (as covered by Guildford 008A, 008B and 011A Lower Layer Super Output Areas) contains 2,425 dwellings. The proposed development on Gosden Hill represents an 82.5% increase in the number of dwellings. Quite apart from the destruction of green-belt land and village character of the
neighbourhood, notwithstanding the massively increased pressure on provision of adequate water, sewage and power services, the impact on road transport will be unbearable.

Currently the road network serving Burpham (primarily London Road, New Inn Lane and Clay Lane) is stretched beyond capacity on a daily basis, a situation that is exacerbated if there are problems on the A3, which, unhappily, occur regularly. The proposed construction of new A3 southbound on and off slip roads and minor alterations to London Road will only have the effect of funnelling more traffic through Burpham. At present there is often gridlock at the roundabouts connecting London Road to New Inn Lane and Clay Lane: a potential increase of 3-4,000 vehicles passing through the area as a result of the Gosden Hill development would make this a permanent feature. It is true that a proportion of this extra traffic would join the A3 southbound but the only effect of this would be to stretch the congestion further north: even now at peak times, the southbound queue tails back from the beginning of the elevated section to the Burpham off-slip.

There can, and must, be no more major housing developments anywhere in Burpham (or Merrow or West Clandon for that matter) until the road transport problem is solved: prior to any consideration of the Burpham local road network the problems presented by the A3 have to be resolved. Whether the answer is a tunnel, widening, double-deck or a by-pass to the by-pass, until the solution is in place – that is built and operational – there has to be a moratorium on large-scale housing development in Burpham and its neighbouring wards.

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<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2774</th>
<th>Respondent: 15572929 / Jane Thomas</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth</td>
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<td>I would like to object to the proposal in the Guildford Local Plan 2016 to remove Green Belt protection from Chilworth:</td>
<td></td>
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<tr>
<td>1) Chilworth has already had many new houses built in recent years. Further expansion risks destroying the rural nature of the village, which Green belt protection helps to maintain.</td>
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<td>2) Expansion at the edges of the village will gradually remove the buffer between Chilworth and the neighbouring villages of Shalford and Albury, resulting in an eventual conurbation with Guildford.</td>
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<tr>
<td>3) The existing traffic levels along New Road are excessive, resulting in high levels of air and noise pollution to those houses along the road. Further development will exacerbate this to unacceptable levels.</td>
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<tr>
<td>4) Due to UK agreeing to leave the EU and the resulting reduction in the net immigration figures the projected housing requirement will be reduced.</td>
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<td>I believe that only by retaining Green Belt protection for Chilworth and its surrounding villages can these problems be controlled.</td>
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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
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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
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).

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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.

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Attached documents:

Comment ID: pslp172/3774  Respondent: 15572993 / Laura Jamieson  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 many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe, putting my family and others in danger.

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. RHS Wisley traffic already cause frequent congestion by traffic on local roads – there is already vulnerability and this will get worse.

1. The associated traffic increase from the RHS has not been taken into account.
2. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis – again, more danger and potential fatalities.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB and destroy the far reaching countyside views for future generations. Surely there is a responsibility to maintain this?

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

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 – Why bother to consult if you then ignore the overwhelming popular view?.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

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Yours faithfully,

Charlie Jamieson
Bedford Gate Cottage, Elm Corner, Ockham GU23 6PX

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I must object in the strongest terms to the proposed development in the Clandon, Ripley and Send areas. Whilst I do not live locally I have many friends who do and I was connected to the Ripley Cricket Club, one of the oldest in the world, for many years.

The English countryside is a resource that must be, for obvious reasons, preserved and cherished. Should you allow this project to happen then, in my opinion, you will alter forever the character of the above villages and you will be making a mistake that it will be impossible to rectify.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17198   Respondent: 15573793 / Alan Ridley   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 overdevelopment of 13,860 new houses is not sustainable, as the infrastructure is inadequate and will result in huge traffic congestion, insufficient school and medical services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object most strongly to the proposed local plan submission by Guildford Borough because:

I do not believe places (in this instance villages Ripley, Send and Clandon and sites at Wisley Airfield and Garlick's Arch) should be removed from Green Belts simply to build housing and industrial estates. Green Belts should be protected, otherwise eventually there will be no open spaces left for us to enjoy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPA16/2777  **Respondent:** 15573825 / James Clarke  **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 with concerns regarding proposals for the Horsley Villages. These are some points I would like to make.

- Why have GREENBELT in the first place when you just take it away without making “the exceptional circumstances” for doing so more clearer and you do what you want anyway?
- Why is West Horsley to increase 35% more - making it larger than any other single area in the Borough to be expanded?
- The Proposals will eradicate the two villages beyond recognition and this will be gone forever!
- What effect will all these proposed housing have on the roads – lets face it you do not keep the current ones in good repair – we can count on around two further cars per households so our villages will not be villages anymore.
- The effect on our GP surgery will be immense.
- 2,000 houses being built in Ockham will have a significant impact in The Horsleys in itself.
- Why is the SHMA target for housing been increased by Guildford Borough Council?
- Parking for the station will be overloaded.
- Why blur the boundaries of the two villages?

- **THE VILLAGES WILL BE GONE FOREVER DESTROYING THE CHARACTER OF THE AREA COMPLETELY.**

I hope that these concerns will be seriously looked into.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/5758  **Respondent:** 15573857 / Emma Greene  **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 (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:** PSLPA16/2782  **Respondent:** 15573889 / Valerie Hewitt  **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): ( )

Green Belt Removal Chilworth

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2786  **Respondent:** 15573921 / Carolyne Jackson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to the 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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5762</th>
<th>Respondent: 15573921 / Carolyne Jackson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I object to the late inclusion of site A45 Garlick Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5763</th>
<th>Respondent: 15573921 / Carolyne Jackson</th>
<th>Agent:</th>
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<tbody>
<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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</table>

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:

<table>
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<tr>
<th>Comment ID: PSLPS16/5764</th>
<th>Respondent: 15573921 / Carolyne Jackson</th>
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<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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</tbody>
</table>
I object to site A45 The Talbot - this is overdevelopment in a conservation area. Wisley Airfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/11661</th>
<th>Respondent: 15573921 / Carolyne Jackson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</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): ()

This Green Belt was implemented for a reason, to protect from urban sprawl, to ensure Green spaces for generations to come not just for our generation. The Green Belt is not just for the people who live in the villages but for Londoners too for their health and their mental well being. There are plenty of other places to build that are more suitable, this seems to me to be a corrupt way for someone to make money at the expense and misery of everyone else not just for today but for the children and the wildlife of the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>PSLPP16/11663</th>
<th>Respondent: 15573921 / Carolyne Jackson</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A25 Gosden Hill Farm - massive overdevelopment of 2000 homes in the green belt

I object to site A35 Wisley Airfield - 2000 homes that are totally inappropriate and unsustainable development in the Green Belt.

I object to any 'in-setting' (ie removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
| Comment ID: PSLPP16/11665 | Respondent: 15573921 / Carolyne Jackson | 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 |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/11664 | Respondent: 15573921 / Carolyne 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 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: PSLPS16/5767 | Respondent: 15573953 / Barbara Forrest | 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? ( ) |
Appropriate development. The site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the TBHSPA 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 which have not been demonstrated
- The site is not big enough to provide satisfactory living standards even for “affordable housing”.
- Four and five storey buildings are not appropriate in the rural environment nor on an elevated site.
- Residents will be crammed in with little outdoor space, a noisy location, with very poor air quality. The density of housing proposed is similar to that in Islington.
- The site is clearly visible from the Surrey Hills AONB and as a result it will have a negative impact on views to and from the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8304  Respondent: 15573953 / Barbara Forrest  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): ()

Inaccuracy of the documentation : There are factual errors in the documentation

- Highways England have recommended that the proposal cannot be determined due to the applicants failure to provide traffic data in the format required
- There are a number of misrepresentations in the paperwork e.g. nine stations within 5 miles – this is however “as the crow” flies – only Horsley and Effingham Junction are within 5 miles by usable road from the middle of the development
- The applicant’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, a habitat for rare flora and fauna, (14ha) has never had buildings. The remainder of the site (55%) is high quality agricultural land.

Other: This site is not deliverable within 5 years due to problems with sewerage and water capacity,

outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

- No very special or exceptional circumstances exist - Alternative sites exist
- The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan
- The site is not listed for development under the existing 2003 Local Plan
- There is not enough land to provide a sustainable community based on GBC’s own parameters
• There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11680  Respondent: 15573953 / Barbara Forrest  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): ( )

Air quality: The air quality figures are based on an unreliable transport assessment.

• The applicant has not used the DEFRA modelling statistics as required and rather appears to have used numbers from an unrecognised (and unreliable source)
• Poor air quality is exacerbated in the area by temperature inversions which trap the air. Young and old are extremely susceptible to poor air quality.
• Air quality is not improving as fast as expected, partly due to the excessive emissions (VW et al)
• The impact of poor air quality on RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area (SPA) is already in excess of legal limits.
• The Medical facilities in the area are already over stretched and adding more people whose lives and health are likely to be impaired by pollution will add to the inadequacies that already exist and create more problems for residents.
• The current NHS waiting lists and A&E waiting times at the Royal Surrey will be made even worse by adding to the population and creating a situation where there will be more cars on the A3 and M25 and narrow local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11684  Respondent: 15573953 / Barbara Forrest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
**Transport:** The transport assessment makes a number of erroneous assumptions and is not credible.

- It is completely unrealistic to assume that there will be a decrease in vehicle movements.
- There is no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children will have to be transported to the nearest available school in Leatherhead – adding to congestion.
- There appears to be no impact shown for the 270 daily bus movements or for the waste lorries or HGV deliveries to the site.
- The TRICS data used for comparison is not a relevant measure: site not comparable with a site in Guildford, nor a site 400m from the centre of Redhill, nor one on the edge of Staines.
- The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.
- The modelling in the Transport Assessment at 7 junctions close to the site bear no relationship to the daily experience of residents, evidencing flawed modelling.
- 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/Downside and further afield.
- If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those needed by the RHS.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11685  **Respondent:** 15573953 / Barbara Forrest  **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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**Impact on the local area:** The additional 5,000 residents is the equivalent of almost doubling the population of East and West Horsley combined. This increase in local population will impact:

- Light pollution, noise, traffic and infrastructure which has been gravely underestimated and proposed mitigation measures are totally inadequate.
- The cumulative development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge per the objections from both Elmbridge Borough Council and Woking B C.
- The water table and flooding in the area. It appears that no impact assessment has been done relating to the loss of agricultural land which currently soaks up a significant volume of rainwater.
- Listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm.
- Via closure of a number of local roads coupled with an increase in traffic will affect a large number of road users from Cranleigh to Cobham and everywhere in between.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11677  **Respondent:** 15573953 / Barbara Forrest  **Agent:**
I write to **OBJECT** to amended planning application 15/P/00012 for the following reasons:

**Sustainability:** 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 are already running over capacity.

- 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 hazardous due to surface water seeping from fields and ice and snow in winter. GBC has failed consistently to remedy the issues of Ockham Road flooding, simply placing the onus on the motorist with signage urging them to Beware. The very fact that signs are placed shows GBC has been alerted to a problem yet failed to remedy it, placing lives at risk. This will be exacerbated with a higher population density.
- There is no spare parking capacity at either of the local stations.
- Local villages have been disfigured by gallons of yellow paint to prevent parking- yet another indication of over-capacity of use and yet the basic issue has not been addressed- more parking is needed but there is no space for it. Adding more people will only make things worse.
- Sites of this size are required to provide outdoor open space. The applicant has “double counted” the outdoor space with that required for SANGs
- The loss of high quality agricultural land is in contravention of policy.

**Thames Basin Heath SPA/SSSI/SNCI:** The impact of 2,068 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species (including skylarks, nightjars and many others on the RSPB red list) in contravention of the EU Birds Directives and Habitats Regulations

- The siting of the proposed Suitable Alternative Natural Green Space (SANG) adjacent to the SPA will only increase visitor numbers causing further damage
- Part of the SANG is in a designated flood plain
- Para 119 of the NPPF “presumption in favour of sustainable development” does not apply where development requires assessment under the Birds or Habitat Directives
- It is impossible to state without doubt that the mitigation proposed will prevent damage to the SPA particularly in the light of inadequate traffic/air quality reports.
There are likely to be over 700 dogs and 700 cats living on the proposed development. These will be a constant threat to ground nesting birds on the SPA and cannot be mitigated by one warden working a normal working day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1402  Respondent: 15573953 / Barbara Forrest  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): ()

Inaccuracy of the documentation: There are factual errors in the documentation

- Highways England have recommended that the proposal cannot be determined due to the applicants failure to provide traffic data in the format required
- There are a number of misrepresentations in the paperwork e.g. nine stations within 5 miles – this is however “as the crow” flies – only Horsley and Effingham Junction are within 5 miles by usable road from the middle of the development
- The applicant’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, a habitat for rare flora and fauna, (14ha) has never had buildings. The remainder of the site (55%) is high quality agricultural land.

Other: This site is not deliverable within 5 years due to problems with sewerage and water capacity,

outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

- No very special or exceptional circumstances exist - Alternative sites exist
- The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan
- The site is not listed for development under the existing 2003 Local Plan
- There is not enough land to provide a sustainable community based on GBC’s own parameters
- There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2800  Respondent: 15574337 / Jacqueline Redknap  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 needed 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: PSLPA16/2801  Respondent: 15574337 / Jacqueline Redknap  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: PSLPS16/5785  Respondent: 15574337 / Jacqueline Redknap  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): ()

<table>
<thead>
<tr>
<th>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.</th>
</tr>
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<tbody>
<tr>
<td>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.</td>
</tr>
<tr>
<td>The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, officesFactories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. How is this going to be funded?</td>
</tr>
<tr>
<td>There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. How is this going to be addressed?</td>
</tr>
<tr>
<td>Electricity supply is also inadequate and would require a big infrastructure development.</td>
</tr>
<tr>
<td>The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.</td>
</tr>
<tr>
<td>The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>
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: PSLPS16/5786  Respondent: 15574337 / Jacqueline Redknap  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 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 pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5787  Respondent: 15574337 / Jacqueline Redknap  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 and negatively impact on air quality and the health and safety of pedestrians and cyclists and increase noise pollution.

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: PSLPP16/11742  Respondent: 15574337 / Jacqueline Redknap  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: PSLPP16/11738  Respondent: 15574337 / Jacqueline Redknap  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: PSLPP16/11740  Respondent: 15574337 / Jacqueline Redknap  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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Page 936 of 1920
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11741  Respondent: 15574337 / Jacqueline Redknap  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: PSLPP16/11755  Respondent: 15574337 / Jacqueline Redknap  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. 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 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:** PSLPP16/11746 **Respondent:** 15574337 / Jacqueline Redknap **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 is 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: PSLPP16/11754  Respondent: 15574337 / Jacqueline Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11743  Respondent: 15574337 / Jacqueline Redknap  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 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. There is the local school with young children walking along the road on a Monday to Friday basis, which is dangerous with the current level of traffic prior to any increased traffic that would result from further housing on the proposed scale.

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? In summary the health and safety of existing communities are detrimentally impacted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11744</th>
<th>Respondent: 15574337 / Jacqueline Redknap</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</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>I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
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<tr>
<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp; M25 are already at over capacity levels during peak hours and any development prior to improvement of these roads will only make the situations worse.</td>
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<tr>
<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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<th>Comment ID: PSLPP16/11745</th>
<th>Respondent: 15574337 / Jacqueline Redknap</th>
<th>Agent:</th>
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<tr>
<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>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to poor air quality concerns (Policy I3)</td>
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<tr>
<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>
I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11732</th>
<th>Respondent: 15574337 / Jacqueline Redknap</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</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 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, safety for pedestrians and cyclists in particular and greater pollution. Residents, health and safety 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: | PSLPP16/11733 | Respondent: | Jacqueline Redknap | Agent: |
|-------------|----------------|-------------|-------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with 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. What is the robust rationale for this?

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

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 and detrimental.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 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:

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<th>Comment ID:</th>
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<td>I am opposed to the building of 1,800 houses on the hogs back yours a jones Sent using the mail.com mail app</td>
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<td>I am writing to register my objection to the removal of the greenbelt protection from Chilworth and Shalford and Peasmarsh. This would allow the Guildford area to become a sprawling suburban development and would not be good for the rural environment. This is some of the most scenic country and well farmed, productive and used land. Allowing building in this area would be an end to this.</td>
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<td>I OBJECT to the building of 45 houses at Clockbarn Nursery. Tannery Lane is a very narrow and twisty road. The junction with Send Road is hazardous and it is difficult to join the Send Road. I understand that planning permission has already been given for some apartments at the Tannery and also for the building of the Marina. This will all generate heavy traffic.</td>
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<td>I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch.</td>
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<td>The site floods and is covered by ancient woodland.</td>
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I OBJECT to the new interchange with the A3 at Burnt Common. Send would have to take traffic from other proposed sites - 2000 houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Send Road is already very busy. 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: PSLPS16/5792  Respondent: 15574497 / Ann Murray  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 pitches at Send Hill. This is an inappropriate location being on the site of landfill waste. It is registered with Guildford Borough Council as containing unsafe waste. Send Hill, at that point, is a single track road. The exit on to Potters Lane is a blind corner. This part of Potters Lane is at National Speed Limit (60 mph). This makes this junction very dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11758  Respondent: 15574497 / Ann Murray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send Village being removed from the Green Belt. Local Councillors and Central Government made a clear election promise to protect the Green Belt. This would break that promise. In future there would be nothing to stop developers taking advantage of this. The Green Belt prevents Guildford and Woking becoming one conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1700  Respondent: 15574497 / Ann Murray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 Clockbarn Nursery, Tannery Lane because there is an increase from 45 homes to 60. Despite hundreds of previous objections made by local people, concerned about access and traffic problems in Tannery Lane, surface water flooding and erosion of the Green Belt the number of houses planned has been increased. The idea of a planning consultation is that the Council listens to the concerns of local people and alters its plans to take account of these objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1702  Respondent: 15574497 / Ann Murray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Burnt Common, London Road because of the introduction of the word "minimum". This proposal was deleted from the Plan in 2014 because of the number of objections. The word "minimum" gives the council free rein to develop what it likes. Again this land is in the Green Belt. There are empty sites at Slyfield and Guildford. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land over the whole Borough - this would mean a huge over allocation of 10 hectares at Send in the Green Belt.

Again, there would be increased traffic, adding to the problems already mentioned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/466  Respondent: 15574497 / Ann Murray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Green Belt, Policy 2 at paragraph 4.3.15**

I object to the proposal to inset Send Business Park from the Green Belt because this small development is in an area of outstanding countryside next to the River Wey. To further develop here would take more land out of the Green Belt.

Tannery lane is a narrow, winding lane causing restricted access for vehicles in both directions.

The original Plan proposed 485 houses and 2 traveller pitches. The new proposals have increased the number of houses to 500, despite concerns from local people. Send has now been allocated 2 traveller pitches and 8 show people plots - a total of 10. Gosden Hill and Wisley - developments of 1500 houses - have only been allocated 8 each.

Recently I heard Mrs May in Parliament reaffirming that the Government is protecting the Green Belt! These plans do not support this statement.

**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 strongly to the proposed New Local Plan for East and West Horsley. We have lived in both East and West Horsley for approximately 35 years and so know the area extremely well. We feel certain that the proposal of a further 533 houses in the area will put inordinate strain on the local services, schools, GP practice, roads, parking and general infrastructure. The list is endless.

Having lived in the Horsleys for such a long time, we have seen very many new houses and apartments built on available land and infills which has already put additional strain on local facilities; examples include the GP practice and parking at the shops and the train station in East Horsley.

I should be grateful if you would note my objections accordingly

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>15574625 / Alan Cook Consultancy (Alan Cook)</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

The land availability assessment and strategic housing market assessment have not picked up on all available sites and require further work. Consequently, policies H1-H3 require further work and are not based on up to date analysis of available sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11769  Respondent: 15574657 / James Goldsworthy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the 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 removal of the greenbelt protection from Chilworth and Shalford and Peasmarsh.

This would allow the Guildford area to become a sprawling suburban development and would not be good for the rural environment.

This is some of the most scenic country and well farmed, productive and used land. Allowing building in this area would be an end to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2809  Respondent: 15574689 / Steve Godman  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 write to formally register my objection to the proposed developments being suggested on the Greenbelt areas within Normandy and Flexford.

These proposed developments are huge when compared to the current size of these villages and will dramatically change the whole area from social as well as environmental aspects. I have reviewed the environmental proposals and assessments and do not concur with the anticipated outcomes relating to the long term sustainability of the proposed developments and strongly believe that they will be detrimental to the proposed areas and surrounding Greenbelt areas.

Overall, I do not accept GBC's suggestion that we have exceptional circumstances that require the compulsory change of land designation in Normandy and Flexford from Greenbelt land to Residential.

I also do not accept the suggestion that we need more schools and that these should be built again on Greenbelt land in Normandy; I understand that based on our current population of the local areas we have spare capacity within the education system.

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 STRONGLY OBJECT to the continued inclusion of the former Wisley airfield now know as the Three Meadows as a strategic site in the local plan.

I object to the total disproportionate number of housing in this part of the borough it is a massive encroachment on the green belt. It is ridiculous for over 2000 houses to be built in a village that's train station is already at maximum capacity, as are the schools and doctors. The infrastructure required for such a massive influx of people would need an entirely new village. The country roads would prove extremely dangerous to have over 2000 cars on top of the already narrow and busy roads.

I object as it would totally ruin the beautiful and historic village of Ockham that has been lived in for generations of families.

To conclude I once again fully and wholeheartedly object to the inclusion of the former Wisley airfield now know as the Three Meadows as a strategic site in the local plan.

Take it out. Save this beautiful village for future generations in this already rapidly decreasing green land.

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 very strongly to the inclusion of Three Farms Meadows in the draft local plan for so many reasons.

I object to the fact the council has still not removed this site from the local plan, despite receiving thousands of objections from the local residents. This is a waste of tax payers money as it has been ignored by the council.

It's further from railway stations the any other identified strategic site. Which are at full capacity anyway.

It's close to junction 10 of the M25, which is one of the most congested junction in the country, this would cause further congestion in an already congested area.

There are narrow country lanes surrounding the area, which allow no pavements or lighting for people to travel at night, it's unrealistic and unsafe to assume people will travel this way.

I consider for the reasons listed above and multiple other reasons that this plan should not be put forward. Unlike previous objections, I hope you take this seriously and listen to the local residents, this is where we live and it means a great deal to us. Hence why we have objected so many times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2810  Respondent: 15574753 / Richard G Page  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been a resident at the above address for 39 years.

My objections are:-

1. The proposal to remove the Horsley’s from the Green Belt seems arbitrary. Exceptional circumstances are prescribed for this action and so far none have been put forward.
2. The infrastructure in East Horsley in particular is only just adequate at the present time. Parking in shopping locations are over crowded, station parking is very congested, medical practices are overburdened and the roads are dangerously busy. In East Horsley several years ago such was the concern for the elderly or handicapped villagers crossing Ockham Road South that a crossing light was installed at significant cost. Since then traffic has increased and with a higher density population traffic will be a significant danger to pedestrians in the area. No plan has been produced to show how to deal with these serious infrastructure problems.
3. The Thatchers Hotel site (48 properties) on a bend on the A246 will cause dangerous congestion on an already very busy road during the rush hour.
4. Proposed infills near St Matins Church on Ockham Road South will completely change the character and the environment in a village setting that will be destroyed.

5. Station Parade to be designated a District Centre seems to be a proposal that lacks all sense. The facilities at the location are fully stretched. I do not feel that the planners have fulfilled their responsibilities to fully understand the nature of the facilities in our villages centre. If this proposal happens a sensibly size village will be turned into an urban sprawl. This will totally change the environment in which I had selected to live.

6. May I have an acknowledgement that this has been received.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5801  Respondent: 15574785 / Jennifer Wright  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.

I am writing to object to the removal of the former Wisley Airfield from the Green Belt, and the proposed increase in housing in our surrounding area.

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. And no exceptional reasons have been given for this to happen. With so many brownfield sites in urban areas to be regenerated this is an outrageous grab to take away our precious and prized Green Belt that can be enjoy by all now and HOPEFULLY in the future for our children. That’s if Guildford Council do not chip away at it.

I also object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham. This will have a huge knock on effect to our circumstances in historic Downside Cobham where I live, in regards to the traffic, noise, oversubscribed school places, the struggle to get a GP appointment, and the already extremely over packed commuter trains from Effingham Junction as well as the constantly full station parking. There are no footpaths, cycle paths and very fast traffic along the lanes in the area approaching Effingham station so you have to commute by car to the station. Alternative stations such as Cobham and Stoke D’Abern, Weybridge, or Esher are also at capacity, if not more so. It is already a battle to get to work, please don’t make it even harder for us.

In Downside we already suffer with the noise and pollution of the M25 and service station, the development of more housing will add to this problem with all of the building site traffic on our narrow roads, and the pollution this will cause.

The infrastructure to support such an increase in housing is blatantly NOT in place and there is absolutely no plan to invest in such infrastructure before or after such an increase in population. Guildford Council will be a disgrace to approve these increases and the removal of the Green Belt, damaging our way of life, and the natural wildlife we are surrounded by.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Please see my Objection to Planning Proposal – Policy A 43. 30 ha Land at Garlicks Arch Burnt Common.

I would like these objections to be seen by the planning Inspector.

My objection is based on the following:

- There is already sufficient housing proposed for the borough (18,860) so there is no need for this additional development.
- This is a New site and was not included in the Regulation 18 draft and has not been consulted upon previously.
- This is Green Belt land permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances here.
- The site is a place of natural beauty and a natural conservation area which has existed since the 16th Century.
- The proposed industrial development is not required (the latest Employment land Needs Assessment 2015 (ELNA) shows a reduction of 80% from the previous draft plan. Any industrial space should be located at the already industrialised site at Slyfield.

A new 4 way interchange onto the A3 would cause even more traffic problems to an already daily congested area. The surrounding roads are not suitable or sufficient to take even more traffic.

In short this is an unsuitable development that should not proceed. Whilst I appreciate we need to provide housing and industrial accommodation we must stop using Greenfield sites until we have exhausted all of the Brownfield options that exist in the borough, of which you will be well aware there are many. We must ensure that we manage land in the borough so that we leave future generations areas of natural beauty that they can enjoy and use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to object to Policy A43 (Land at Garlicks Arch, Send Marsh).

The surrounding Send Marsh area is subject to frequent flooding. A flood plan was put in place a few years ago to try and avoid flooding in the area of Send Marsh Road, between the junctions of Greyfriars Road and Maple Road. The environment agency said at the time that the measures put in place would be suitable for a 1 in 100 years event but this has by no means been as successful as was promised and there is still areas where water lays during prolonged rainfall. The Environment Agency Plans were based on the surrounding area being a woodland area. Changing the Garlicks Arch area to a housing estate would drastically alter the plans the Environment Agency’s put in place. I attended the open session with the town planners at East Horsley Village Hall and the only comments they could offer was that the site would have to solve its own drainage problems. The fact is there is no where for the water to go other than down the hill to this area of Send Marsh Road. My house has nearly been flooded on a number of occasions. If these plans were to go ahead I would expect a cast iron guarantee from Guildford Council that my house would never be flooded or that they would compensate me in full if it did happen. Are the council willing to give this guarantee? I would like a response on that point please.

I am not against development and building houses. I do not have a problem with building on the Wisley site which I consider to be brownfield due to the amount of concrete that exists for the now unused runway. The land at Garlicks Arch is however permanent Green Belt land, it is woodland and meadowland that needs to be preserved. We should not be building on Green Belt land and use Brownfield sites instead. Again at the open session with the town planners at East Horsley Village Hall I asked why we were not using more Brownfield sites and the reason I was offered was that many Brownfield sites had multiple landlords and it was difficult to get them all to agree to use the land. A problem being difficult is not a reason to destroy woodland that has existed for hundreds of years.

There is already a traffic jam every workday morning, during rush hour, in Send Marsh Road heading up to the junction of Portsmouth Road and again in the evening. The main Portsmouth Road could not cope with the additional traffic that 400 new homes would create and definitely could not cope with large Travellers vehicles. People who do not live in the area would not be aware of the problems the large vehicles cause every year when the Ripley Bonfire takes place to have this type of chaos on a regular basis would be totally unfair on the residents.

There is already sufficient provision for Travellers in Ripley so I do not see why we need to provide more plots.

The Send Marsh area is already densely populated with issues around school places and an over-subscribed Doctor’s surgery. It is already difficult to get a doctor’s appointment this policy is clearly an over development of an area that is already creaking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing in regards to the local plan in which Guildford Borough Council is proposing to remove Green Belt protection from a number of villages around the Guildford area, which includes the area where I live, Chilworth.

Not only would I say this is a betrayal of environmental protection that makes this area of the South East so special it is also nonsensical in terms of the infrastructure in this area. Having the misfortune to have to travel from New Road in Chilworth to Guildford on a regular basis using the A248 and A281 I can tell you that this journey of roughly 3 miles can already take between 20 and 40 mins depending on which time of day you happen to undertake the journey. The thought of adding new housing around Chilworth, Shalford and other local villages will make this situation completely untenable. Add in destroying green belt land which we will never get back then I ask you to reconsider the local plan.

I appreciate the need for new housing and this isn't small minded 'nimby-ism' but there must be better areas with the necessary infrastructure in place (or green field sites where these can be added) than a huddle of already over populated villages with 1 road into Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to remove villages such as Chilworth, Peasmarsh etc from the greenbelt is unacceptable. These areas are areas of natural beauty and are what makes this area of the surrey Hills such an attractive area to live in, cycle in, kids to grow up etc. I strenuously object to Chilworth being removed and it should stay within the greembelt and as an area of outstanding beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Finally, I do not consider the proposed new interchange with the A3 at Burnt Common has been thought through sufficiently and that this should not be entertained until major improvements are made to the A3 to deal with the existing problems that occur morning and evening (most days now). Therefore I object to this part of 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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</table>
The Send Hill and Clockbarn Nursery developments I support providing there is adequate provision for children of Send village to acquire properties as currently no young people can afford to buy in Send. I feel more should be done by Guildford Borough Council to provide housing in Send with a suitable covenant that they can only be bought by people with a long standing connection with Send village - by this I mean not only when new but also when resold.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11797  **Respondent:** 15574913 / Peter David Sheppard  **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):** ()

Having lived in Send since 1982 I consider that the infrastructure does not support all the proposed developments in the Plan. The amount you have identified to upgrade the infrastructure is woefully short of the amount required for adequate upgrades and I therefore object to Send village being removed from the Green Belt. If suitable upgrades to the infrastructure can be made I would reconsider.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11802  **Respondent:** 15574945 / Tim Crook  **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**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11805  **Respondent:** 15574945 / Tim Crook  **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 development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11806  Respondent: 15574945 / Tim Crook  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: PSLPP16/11809  Respondent: 15574945 / Tim Crook  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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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 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.

** 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:
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: PSLPP16/11798  Respondent: 15574945 / Tim Crook  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 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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Comment ID: PSLPP16/11801  Respondent: 15574945 / Tim Crook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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: PSLPP16/11804  Respondent: 15574977 / Nicola 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 would like to register my objection to the removal of the Green Belt protection from several local villages. Removal of this protection would allow development in an area which is already very congested both mornings and evenings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2818  Respondent: 15575009 / Tony Redknap  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: PSLPA16/2819  Respondent: 15575009 / Tony Redknap  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: PSLPS16/5814  Respondent: 15575009 / Tony Redknap  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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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. How is this going to be funded?

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. How is this going to be addressed?

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:**
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 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: PSLPS16/5823  Respondent: 15575009 / Tony Redknap  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 and negatively impact on air quality and the health and safety of pedestrians and cyclists and increase noise pollution.

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:** PSLPP16/11834  **Respondent:** 15575009 / Tony Redknap  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11824  **Respondent:** 15575009 / Tony Redknap  **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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<td>I object to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)</td>
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<td>Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.</td>
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<td>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.</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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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 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?
Do you consider this section of the document; 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 is 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: PSLPP16/11853  Respondent: 15575009 / Tony Redknap  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: PSLPP16/11841  Respondent: 15575009 / Tony Redknap  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 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more
congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the
villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in
road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result
in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and
risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road
making it very dangerous, especially when vehicles mount the pavements. There is the local school with young children
walking along the road on a Monday to Friday basis, which is dangerous with the current level of traffic prior to any
increased traffic that would result from further housing on the proposed scale.

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? In summary the health and safety of existing communities are detrimentally impacted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11842  Respondent: 15575009 / Tony Redknap  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 over capacity levels 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: PSLPP16/11843  Respondent: 15575009 / Tony Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Page 972 of 1920
Do you consider this section of the document; complies 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: PSLPP16/11812  Respondent: 15575009 / Tony Redknap  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, safety for pedestrians and cyclists in particular and greater pollution. Residents, health and safety 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:** PSLPP16/11816  **Respondent:** 15575009 / Tony Redknap  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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. What is the robust rationale for this?

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 and detrimental. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 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: PSLPA16/2817  Respondent: 15575041 / Marie York  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 needs number.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11830  Respondent: 15575041 / Marie York  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt.

I object to any "in-setting"(i.e. removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11832  Respondent: 15575041 / Marie York  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough.
I object to the last minute inclusion of new sites with less than 2 weeks notice.
I object to the limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5811  Respondent: 15575137 / Charlotte Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to 45 more houses being built at Clockbarn Nursery because I do not believe that there will be adequate access and traffic volume will be increased. This will be disastrous as traffic and delays is already a problem in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5813  Respondent: 15575137 / Charlotte Procter  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 houses and a new interchange with the A3 being put at Burnt Common because Send will have to take a vast increase in traffic if this happens. This traffic would come from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and Blackwell Farm. Much of the traffic from these areas would go to and from the A3, M25, Woking and Guildford through Send. Send is already overloaded with traffic and it would be gridlocked if it had to take on so much more. The pollution levels would also become even worse.
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: PSLPS16/5812</th>
<th>Respondent: 15575137 / Charlotte Procter</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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- I OBJECT to 40 houses being developed at Send Hill and 2 travelers pitches being developed. This is an inappropriate location as the access would be problematic from the narrow width, single access road. Also the subsoil of the proposed site contains documented unsafe landfill waste registered by the GBC.

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: PSLPP16/11845</th>
<th>Respondent: 15575137 / Charlotte Procter</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I am writing this email in order to object to the future plans for Send. Please can this email be shown to the Planning Inspector and please can you confirm that you have received this email. See below for my list of objections:

- I OBJECT to Send Village being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2823</th>
<th>Respondent: 15575201 / Richard Newman</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 SHMA report stating that the need for housing is 693 houses per annum
This figure is too high and over double that of 322 used in previous plans. There is an important lack of transparency here because the Council is unwilling to publish the SHMA report and as a result this figure cannot be verified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5827  Respondent: 15575201 / Richard Newman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the inclusion of Garlick’s Arch (Policy A43) on grounds of congestion
The addition of 400 homes to the Village of Send will result in increased congestion in an already congested area. The impact will be felt in the villages of Send, Clandon and Ripley to name a few.

The only improvements included in the plan to the road network are in the form of two new slip roads which are not expected till “between 2021-27” and at a cost of £10,000,000 each it is possible that they will never be delivered.

I object to the inclusion of Garlick’s Arch (Policy A43) on grounds of sustainability
The addition of 400 homes to the Village of Send is a disproportionate amount of development in this village and there is a complete lack of provision for infrastructure such as Doctors Surgeries or Schools.

To be clear the local plan has allocated the site for “400 homes and up to 7,000 square metres of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8)”. There is NO provision for retail, surgeries or schools. The closest shop referred to as a Waitrose is actually a Little Waitrose in the petrol station.

I object to the inclusion of Garlick’s Arch (Policy A43) on grounds of deliverability
The deliverability of Garlick’s Arch is highly questionable due to the following:–

- Large areas of Garlick’s Arch being in Flood Zones 2 and 3.
- Four electricity pylons running through the centre of the site.
- Ancient Woodland dating back to the 16th Century boarding and within the site.
- Pollution levels currently recorded.
- No existing screening protecting the site from noise or visual impact of the A3.
- Ecological impact.

I object to the inclusion of employment area within Garlick’s Arch (Policy A43)
The creation of a second employment area in Send Village is unnecessary and at the detriment of the village. There is an existing industrial area Burnt Common Nurseries comprising of three industrial units totalling 50,000 square feet. These units are fully occupied and there is sufficient open land to accommodate a further 7,000 square metres.

Combining the two industrial areas will create a strategic employment site for the borough. Whereas locating the new industrial area in close proximity to residential may put of potential tenants concerned about restrictive working hours and will result in increased traffic and road safety issues.

I object to the inclusion of Garlick’s Arch (Policy A43) and Land for new North facing slip roads to/from A3 (Policy A43a) on the grounds of transparency

The Local Plan is misleading in that it does not state that Policy A43 and Policy A43a are intrinsically connected due to the owners of Garlick’s Arch gifting the land for the slip roads on the condition of receiving planning permission for housing.

Each of these Policies states a number of “Key Considerations” and “Requirements” none of which is that each policy is subject to the adoption of the other.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of Garlick’s Arch (Policy A43) and Land for new North facing slip roads to/from A3 (Policy A43a) on the grounds of suitability

The Garlick’s Arch site replaced the Burnt Common Nurseries site which was included in all previous drafts of the local plan and was allocated for industrial use and housing. Whereas the Garlick’s Arch site is Green Belt and the site has never been previously developed the Burnt Common Nurseries site has been previously developed and includes three industrial units totalling 50,000 square feet. This site was previously highlighted by Guildford Borough Council as key to meeting the industrial needs of the Borough.

The Burnt Common Nurseries site is also more deliverable and suitable given the scale of Send Village. There is mature screening around the Burnt Common Nurseries site, there are no pylons or flood risk and all ecology reports have been produced supporting the suitability of the site. There are also three existing access points to the site.

I object to the Land for new North facing slip roads to/from A3 (Policy A43a) on the grounds of funding

Appendix A Page 278 of the Local Plan states that the northbound and southbound slip roads will be developer funded at a cost of £10,000,000 each thus a total of £20,000,000. Clearly the developer of the 400 homes at Garlick’s Arch will not fund these alone. Is there any evidence that £20,000,000 can be raised to fund these slip roads from developers on top of all the other necessary infrastructure work?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2822  Respondent: 15575233 / Anthony Crovella  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to strongly oppose the Draft Local Plan for Guildford.

As a resident of West Horsley I am appalled by the contents of the draft, the proposal to remove the Horsleys from the Green Belt and the proposal for over 500 new homes in East and West Horsley.

The local infrastructure - schools, roads, GPs, local shops are already stretched. The introduction of a vast number of new homes will push local services to breaking point.

The exceptional circumstances required to remove East and West Horsley from the Green Belt have not been demonstrated and no sound reasons have been given for the extension of settlement boundaries around the villages.

It is clear that the draft local plan is flawed, and I urge Guildford Borough Council to reconsider.
As a resident of Burpham I have particular interest in the plan to build 2,000 houses on the Gosden Hill Farm site. This development impacts on all policies (except for numbers 5, 9 and 11) detailed in the Evidence Base. There is a worrying lack of detail about confirmed improvements to the infrastructure needed to support this one housing development (let alone the other sites in the Plan) but the lack of consideration and detail to the transport infrastructure is of most concern. Guildford definitely needs more schools, it needs more housing, but it also needs an inspirational approach to traffic management through the town and the A3. The Plan fails in its Duty to provide a sound solution to the traffic problems that will follow from another 2,000 houses and associated cars in the Clandon/Burpham area.

According to the most recent ONS Neighbourhood Statistics, Burpham (as covered by Guildford 008A, 008B and 011A Lower Layer Super Output Areas) contains 2,425 dwellings. The proposed development on Gosden Hill represents an 82.5% increase in the number of dwellings, which is an astonishing increase, and one which will inevitably have an impact on a wide environment. It is the duty of GBC to manage that impact effectively and appropriately. Quite apart from the destruction of green-belt land and village character of the neighbourhood, and, notwithstanding the massively increased pressure on provision of adequate water, sewage and power services, the impact on road transport will be unbearable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to register my strong opposition to the GBC plan as it is currently framed as I do not believe the strategy and sites as a whole to be sound. As a resident of Burpham I have particular interest in the plan to build 2,000 houses on the Gosden Hill Farm site. This development impacts on all policies (except for numbers 5, 9 and 11) detailed in the Evidence Base. There is a worrying lack of detail about confirmed improvements to the infrastructure needed to support this one housing development (let alone the other sites in the Plan) but the lack of consideration and detail to the transport infrastructure is of most concern. Although Guildford needs more schools and housing, it first urgently needs an effective approach to traffic management through the town and the A3. The Plan fails in its Duty to provide a sound solution to the traffic problems that will follow from another 2,000 houses and associated cars in the Clandon/Burpham area.

According to the most recent ONS Neighbourhood Statistics, Burpham contains 2,425 dwellings. The proposed development on Gosden Hill represents an 82.5% increase in the number of dwellings! This is a massive increase and will inevitably have an impact on a wide environment. It is the duty of GBC to manage that impact effectively and appropriately. Quite apart from the destruction of green-belt land and village character of the neighbourhood, and, notwithstanding the massively increased pressure on provision of adequate water, sewage and power services, the impact on road transport will be unbearable.

Currently the road network serving Burpham (primarily London Road, New Inn Lane and Clay Lane) is stretched beyond capacity on a daily basis and is made far worse if there are problems on the A3, which happens regularly. The proposed construction of new A3 southbound on and off slip roads and minor alterations to London Road will only have the effect of funnelling even more traffic through Burpham. At present there is often gridlock at the roundabouts connecting London Road to New Inn Lane and Clay Lane: a potential increase of 3000+ vehicles passing through the area as a result of the Gosden Hill development would exacerbate this problem and make it fairly consistent throughout the day, not just at rush hours. Although some of this extra traffic would join the A3 southbound, this would only stretch the congestion further north when even now at peak times, the southbound queue tails back from the beginning of the elevated section to the Burpham off-slip. It also to be noted that such an increase in traffic doesn’t just affect Clandon, Merrow and Burpham, it would have a corresponding effect on town centre traffic flow, congestion and parking.

Before embarking on further housing developments in Guilford, it is vital that the existing road and traffic problems are addressed first, which would also include addressing the congestion and safety issues of the A3. Those who agree to the plan as it currently stands would be making a mistake. It would be their names connected with consigning Guildford to a future of increasing traffic congestion, regular gridlock, and increased pollution. The lack of practical detail regarding important infrastructures, such as roads, traffic flow and increased sewerage and water provision, indicates that the plan has not been positively prepared, and as such is not justified and consequently cannot be effective; it therefore does not meet GBC’s own overall aspirations and thereby fails the Duty to Cooperate.

Until the GBC Local Plan has concrete solutions to the current traffic problems, experienced on the main arterial roads into Guildford, and effectively addresses the increased pressure on the road infrastructure placed by new housing estates and new villages, any large-scale housing developments are inevitably in jeopardy. The new GBC Local Plan has not scored positively on its own 7-point On-line Questionnaire for the proposed sites, and that is the basis of my strong objection the Plan in its current form.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11867  **Respondent:** 15575457 / Pauline Johnson  **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): ( )**
Currently the road network serving Burpham (primarily London Road, New Inn Lane and Clay Lane) is stretched beyond capacity on a daily basis, a situation that is exacerbated if there are problems on the A3, which, unhappily, occur regularly. The proposed construction of new A3 southbound on and off slip roads and minor alterations to London Road will only have the effect of funneling more traffic through Burpham. At present there is often gridlock at the roundabouts connecting London Road to New Inn Lane and Clay Lane: a potential increase of 3000+ vehicles passing through the area as a result of the Gosden Hill development would exacerbate this problem and make it fairly consistent throughout the day, not just at rush hours. It is true that a proportion of this extra traffic would join the A3 southbound but the only effect of this would be to stretch the congestion further north: even now at peak times, the southbound queue tails back from the beginning of the elevated section to the Burpham off-slip.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11866  Respondent: 15575457 / Pauline Johnson  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 judicious and forward-thinking approach to housing development in Guildford would be to assess the existing road and traffic problems first, which would also include addressing the congestion and safety issues of the A3. Whether the answer is a tunnel, widening, double-deck or a by-pass to the by-pass, it would have to be very audacious and bullish planners and councillors who would willingly sign their name and stand up to say publicly that they approve of this current Plan. It would be their names connected with consigning Guildford to a future of traffic congestion, regular gridlock, and increased pollution. It also to be noted that such an increase in traffic doesn’t just affect Clandon, Merrow and Burpham, it would have a corresponding effect on town centre traffic flow, congestion and parking.

I3 Until the GBC Local Plan has concrete solutions to the current traffic problems, experienced on the main arterial roads into Guildford, and addresses - justifiably and effectively - the increased pressure on the road infrastructure placed by new housing estates and new villages, any large-scale housing developments are inevitably in jeopardy. The new GBC Local Plan has not scored positively on its own 7-point On-line Questionnaire for the proposed sites, and that is the basis of my strong objection the Plan in its current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1414  Respondent: 15575457 / Pauline Johnson  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 write now to register my strong opposition to the plan as it is currently framed, as I do not believe the strategy and sites as a whole to be sound. The lack of practical detail regarding important infrastructures, such as roads, traffic flow and increased sewerage and water provision, indicates that the plan has not been positively prepared, and as such is not justified and consequently cannot be effective; it therefore does not meet GBC’s own overall aspirations and thereby fails the Duty to Cooperate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

SETsquared's Surrey Centre in is based on the Surrey Research Park as a branch of an organisation owned by a consortium of universities. It is supported by the Department of Business Innovation Science and the Higher Education Innovation Fund.

Its role is to contribute towards the formation and development of technology based start-up companies. It has been benchmarked globally and recognised as one of the world's leading university based business incubator by the UBI Global Index which reviewed 1200 such incubators.

I am writing to you as the CEO of SETsquared in the context of the Guildford Local Plan which is out for consultation.

We have around 70 members under incubation. They benefit from being on the Surrey Research Park because of the opportunity for physical growth, on-site proximity to the university and the opportunity for recruitment and retention of talented staff to build their companies with.

I understand that the consultation draft of the local plan includes policies to support the development of housing, it includes provision for investment in infrastructure and it has an allocation for extending the Surrey Research Park.

Given the role of SETsquared in supporting economic growth I am writing to support the policies in the Draft Local Plan that include alteration to the green belt boundary that will provide for the policies that meet these ambitions.

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 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): ()
Ref: Guildford Borough local plan.

My main observation and concern is regarding the removal of the green belt status of a number of villages including my village of Chilworth. As I understand it this will make development easier as without green belt protection developments are considered agreed in principle. Chilworth has already seen a number of new housing sites without an increase in infrastructure. I feel the council are being misleading as there is no mention of the previously large proposed sites in the latest version of the plan. Presumably without the green belt these previously identified sites will be developed with little local residents will be able to do about it. I understand identifying sites for housing is difficult, but removing green belt status is not the answer.

I trust these comments will be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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 (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5843  Respondent: 15575585 / Sarah Bowen  Agent:

<table>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5851  Respondent: 15575617 / Pete Killingley  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 plans for 45 houses to be built at Clockbarn Nursery, for similar reasons to those already given. The increased amount of traffic, the narrow roads, and so on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5848  Respondent: 15575617 / Pete Killingley  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 houses and 7000 square metres of industrial space at Garlick’s Arch. This seems a bizarre addition to the local plan, given the local flooding risks, and its sheer scale when compared to the existing size of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5850  Respondent: 15575617 / Pete Killingley  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 with the A3 at Burnt Common. Send is already rammed full of traffic during rush hour every day, and it only takes one set of traffic lights in Send, Old Woking, or Kingsfield, and the entire of Send becomes gridlocked, taking half an hour to travel through the village. This is because the road system is already beyond its natural capacity. To have a new four way interchange will only make this worse, and again is being done without regard for the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5849  Respondent: 15575617 / Pete Killingley  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 40 houses and 2 traveller’s pitches at Send Hill. I have to drive along this road every day, and it is already a regular occurrence for traffic to be blocked in both directions as it is so narrow, with sharp bends on a steep hill. Often cars have to reverse to let others through, or sometimes even lorries. The idea to increase the number of houses here must have been suggested by someone who has never driven along here, or doesn’t know the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11869  **Respondent:** 15575617 / Pete Killingley  **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 appreciate that new houses need to be built. However, the village of Send is not the ideal place for these houses, given the strains on the infrastructure that already exist. It will only make problems worse. I urge that proper consideration be given to whether these plans have really been thought through with the best interests of the community at heart.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11868  **Respondent:** 15575617 / Pete Killingley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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 is utterly unnecessary to remove it from the Green Belt, particularly given the clear election promises to protect it. Without Send being part of the Green Belt, it will be absorbed into Woking and Guildford and the character of the village will be further destroyed.

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): ()

My other more general concern is the SHMA. One of my favourite subjects is maths and I know what can be done with numbers to make an argument, but also how models can be floored in design. It seems to me that this model calculation is a total black box, with little validity in assumptions so creates a number that is totally unreal. As such this basis for the Local Plan calculations is floored.

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 - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I want to OBJECT to what is planned all around West Horsley in the Guildford Local Plan. As young citizen of this area and country my voice must be heard.

What is proposed is an utter disgrace and shows a total lack of understanding of the areas needs and totally disregards local opinions. At least we live in a democracy so I can have a say.

I have lived here for 15 years and have seen how the village operates and has grown to a point where local facilities are full; Roads, Schools, Drs, Dentists, Car parks and there is NO capacity for more houses/people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11870  Respondent: 15575649 / India P Donnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 biggest concern is to remove Horsley from the Greenbelt. If you took the time to visit the village you would appreciate that Horsley is totally Greenbelt, surrounded by fields, farms, churches, local history. There is no exceptional case being made for it to be removed and thus should be declined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2831  Respondent: 15575681 / John Francis  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 provision for Garlicks arch so the Plan takes no account of the infrastructure needed 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: PSLPP16/11875  Respondent: 15575681 / John Francis  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): ()
1. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy P1)

At a time of reduced bus services through Ripley and no train stations nearby the cars from the extra houses will clog the already busy roads as the local transport facilities are already inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11871  Respondent: 15575681 / John Francis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with 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 not protecting the Green Belt (Policy P2)

I strongly object to removing the villages of Ripley, Clandon and Send from the Green Belt.

In addition the sites of Wisley Airfield and Garlicks Arch must not be removed as their development would wreck the local area creating an urban rather than a green environment. As required by the National Planning Policy there are no exceptional circumstances for the above sites being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11873  Respondent: 15575681 / John Francis  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 proposed development is not sustainable (Policy S1)

The 13,860 extra houses is not sustainable, my village of Ripley and local villages of Send and Clandon will be damaged, we don’t need these extra houses in our local area. The plan lacks any infrastructure improvements for Garlicks Arch. This development must surely be more suited to an urban area with transport already on hand.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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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 plans for 400 houses and 7000 square metres of industrial space at Garlick’s Arch. This seems a bizarre addition to the local plan, given the local flooding risks, and its sheer scale when compared to the existing size of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5858</th>
<th>Respondent: 15575713 / Sophie Killingley</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>
I object to the new interchange with the A3 at Burnt Common. Send is already rammed full of traffic during rush hour every day, and it only takes one set of traffic lights in Send, Old Woking, or Kingfield, and the entire of Send becomes gridlocked, taking half an hour to travel through the village. This is because the road system is already beyond its natural capacity. To have a new four way interchange will only make this worse, and again is being done without regard for 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: PSLPS16/5857  Respondent: 15575713 / Sophie Killingley  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 40 houses and 2 traveller’s pitches at Send Hill. I have to drive along this road every day, and it is already a regular occurrence for traffic to be blocked in both directions as it is so narrow, with sharp bends on a steep hill. Often cars have to reverse to let others through, or sometimes even lorries. The idea to increase the number of houses here must have been suggested by someone who has never driven along here, or doesn’t know 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: PSLPP16/11878  Respondent: 15575713 / Sophie Killingley  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 appreciate that new houses need to be built. However, the village of Send is not the ideal place for these houses, given the strains on the infrastructure that already exist. It will only make problems worse. I urge that proper consideration be given to whether these plans have really been thought through with the best interests of the community at heart.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11877  Respondent: 15575713 / Sophie Killingley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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 is utterly unnecessary to remove it from the Green Belt, particularly given the clear election promises to protect it. Without Send being part of the Green Belt, it will be absorbed into Woking and Guildford and the character of the village will be further destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2836  Respondent: 15575873 / David Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to OBJECT to Send Village being removed from the Green Belt. The National Planning Policy Framework required that the Green Belt was intended to be permanent and there is no justification for abandoning or reneging that policy. The Green Belt area of Send and the surrounding district is an essential ecological and bio-diverse area; to deviate from that status would open the floodgates to Developers and create a sprawling urbanisation.

I also OBJECT to the construction of 45 houses Clockbarn Nursery as it is wholly inappropriate for the existing road network in that area which is narrow and winding.

I OBJECT too to the proposed development of 400 houses and 7,000 square metres of industrial space at Garlick’s Arch, opposite Send Marsh Road. Part of that site floods and much of it is covered by ancient woodland plus the location is completely in appropriate for industrial units. I would question the need for industrial units in the immediate area but if the demand is there then it makes more commercial and economic sense to extend the Slyfield Industrial estate. If additional
housing is required it would be better located near the existing residential area of Burnt Common Lane/Clandon Road but a sympathetic development limited to a maximum of 10/12 houses of mixed configuration.

I also wish to **OBJECT** to the proposed development of 40 houses and 2 traveller’s pitches at Send Hill because a) the area is again wholly inappropriate for 40 houses with the narrow and twisting roads. It may work with 5 or 6 extra houses but absolutely no more than that and b) travellers by their very nature ‘travel’ and the existing road network is far too narrow and winding for large caravans being towed behind large vans and small trucks. However, I suspect the two traveller’s sites are actually intended as permanent sites which is a fundamental contradiction of terms. If ‘travellers’ want a permanent site then they are no longer ‘travellers’ and should instead be looking for housing accommodation or vacancies on existing residential caravan parks. [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.]

Finally I **OBJECT** to the proposed new interchange with the A3 Ripley Bypass at Burnt Common because Ripley and Send are already heavily congested at peak times with School, A3 and M25 traffic and cannot cope with the extra traffic it and the proposed housing developments of Wisley Airfield, Gosden Hill and Blackwell Farm would generate. The area would become totally gridlocked daily and the noise and pollution levels exceed safe limits for local inhabitants.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPS16/5861</th>
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<th>15575905 / Jennie Barker</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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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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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?
The proposal to remove villages such as Chilworth, Peasmarsh etc from the greenbelt is unacceptable. These areas are areas of natural beauty and are what makes this area of the surrey Hills such an attractive area to live in, cycle in, kids to grow up etc. I strenuously object to Chilworth being removed and it should stay within the greenbelt and as an area of outstanding beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I would like to object to the proposed policy of plan of Guildford borough council on the Following grounds.
1. The building of a school in an area where there is already a surplus of school places and any expansion can be accommodated by organic growth of the schools already in Place.
2. The local plan in the result of Brexit is already out of date, with all projections now Invalid.
3. Destruction of green belt for the sake of building company profits, against the wish and well being of residents.
4. Destruction of valuable natural habitats and wildlife, and strain on nearby protected areas, outside A46
5. The latest proposals are a rushed mark 2 version after the previous plan was found to have several legal issues.
6. The failure of the plan to understand the changing shopping patterns. Where greater use of Internet shopping means there will be more brownfield sites becoming available for use.
7. There is a disproportionate scale of housing in one area, totally changing the character of a village rural environment, also
impacting the view from an area of outstanding natural beauty Surrey hills.

8. Traffic chaos, both Westwood lane and glaziers lane both have pinch points on the road caused by the railway bridges one above and one below the railway, increase in housing will therefore exacerbate this problem. A323 road between Aldershot and Guildford is already busy at peak times and difficult to join the main road from side roads, whenever the A31 has problems A323 becomes an alternative and becomes a slow procession trying to cross the road for pedestrians is extremely difficult.

9. Safety, as above the A323 is already difficult and increasingly difficult for cycle users. Particularly children tiring to get to village primary school by cycle, it is unfortunately only a matter of time before there is a serious incident involving cyclists.

10. Housing development to the west of Normandy already approved will considerably increase traffic through the village, without this ill conceived plan to build a school with a 1000+ students and teaching staff, and 1100 housing units and traveller sites which will just lead to travel chaos, poor air quality, and very unhappy residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/5872</th>
<th>Respondent: 15576513 / Stefan Szyniszewski</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22</td>
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Do you consider this section of the 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 the construction of additional 140 homes on the land north of Keens Lane (A22 site location). Before construction of new homes can be considered, there is an urgent need to prepare public infrastructure for additional cars on the roads, upgrade the drainage system for the increased water demand, as well as to ensure that a local school can accommodate extra pupils and local surgeries can handle additional number of patients.

Firstly, local roads, roundabouts and parking spaces need to be upgraded before any new homes are constructed. Such upgrades are only practical before new construction as they are almost impossible after the road layout is limited by fencing of the new homes. The list of road upgrades needed to enable A22 development is substantial, to name just a few:

Road widening is urgently required on Worplesdon Rd between Keens Ln toward Worplesdon. An extra lane of traffic could be constructed at the expense of the green field to the left of the road. Such widening will not be possible after new homes are built.

(3) Roundabout improvement will also be needed. Currently, it's hard to enter Worplesdon Rd as there is limited visibility of the traffic leaving Guildford toward Worplesdon. This roundabout will almost certainly become a traffic bottleneck after the addition of 140 new homes.

(4) The roads are overloaded and deteriorate quickly. The additional 140 homes x 2 cars per family = 280 extra cars on the road will not help.

Fig. 2. Crumbling roads, Keens Ln and Cranstoun Close shown.

(5) There is a lack of parking spaces. Again, it is not clear if additional 280 cars will improve the parking situation.
Secondly, significant intrusion into the green belt and removal of green space will have an adverse impact on the access and civic enjoyment of local amenities. Currently in the area of Worplesdon Road north of Shepperd Road and Queen Elizabeth park inclusive there is only one recreation area that includes a playground. Not only this is way too little, but the facilities in the playground do not include gear for children less than 3 years old. In addition to the improved road infrastructure, recreation space, playground, secondary school and a nursery shall be considered and included in the local plan.

Finally, we oppose adding approximately 6,900 new homes across Guildford (as proposed in the plan). Currently there are about 66k residents in Guildford, and if we assume there are on average three residents per house it means there is a total of about 22k houses in Guildford as of now. Adding nearly 7k new homes will cause at least a 30% increase in the population number, possibly higher. Guildford is already struggling with traffic, and the quality of life and attractiveness of this place will deteriorate, without any matching investment in public amenities and roads. Only several projects on the long proposed list should be funded. It is prudent to complete selected projects first and to assess their impact before commencing additional construction.

In summary, it is not a feasible plan to construct a massive number of new homes without any substantial public works, such as for example: (i) road widening of Worplesdon Rd, (ii) road widening of Keens Ln, (iii) creation of addition parking spaces, (iv) planning for an additional secondary school and a GP surgery.

Please note attached photos

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: A22 pics.doc (144 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I strongly object to GBC believing that it is ok to using our valuable green belt areas for building.

The A3 is a dangerous and busy road and GBC want to increase that danger and volume of traffic, how will that help the residents

The pollution is bad enough already – how will removing green belt and increasing traffic and household refuse help that?

What considerations have been made with regard to our wildlife?

There are no train links, so people travelling to work will need to drive – how will that help the unacceptable traffic congestion the locals already have to suffer.

Getting a doctor or hospital appointment is already hard enough, how will bringing tens of thousands of people into the area help

Is Green Belt, Green Belt or not? It is the duty of GBC to protect our environment, not bleed it away for the sake of greed. If GBC can’t do that then maybe they should not be employed on our behalf.

Turning our beautiful villages into just another urban sprawl is not acceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPA16/2848  **Respondent:** 15576641 / Hilary Thomas  **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):** ()

Councils cannot afford to repair existing roads, which currently resemble Third World roads in places with all the potholes, so with a huge increase in traffic, how will they ever keep up. The narrow country roads in the area are dangerous now to cyclists and walkers, without extra traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11899  **Respondent:** 15576641 / Hilary Thomas  **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 impact on wild life will be very detrimental too and as for the infrastructure of medical and schools provision necessary, has it really been thought out. A & E departments have closed in local hospitals, so ambulance journeys to A & E are now longer and they don’t need traffic congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11898</th>
<th>Respondent: 15576641 / Hilary Thomas</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 strongly object to the Guildford Proposed Submission Plan (June 2016) to build on Green Belt land.

Apart from the impact of so many houses on the local environment, the Green Belt is the lungs of the country, providing not only clean air but also open spaces in which people can improve/maintain a healthy lifestyle by getting out of door in an enjoyable and therapeutic environment.

I object to the removal of parts of Ripley, Send, Clandon from Green Belt, together with Garlick’s Arch, which would result in Urban Sprawl as well as denying people of the benefits of the Green Belt. A far as development of Wisley Airfield is concerned, the impact on traffic on an already crowded road system would be particularly dire. Generally the impact of 13,000 houses in this area would be huge and since households now generally have 2 cars, the impact on traffic and pollution would be detrimental to health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It would be more appropriate to use existing derelict sites in the area – brown field sites and consider buying up some of the huge houses in the area with single occupancy by senior people, who would prefer to downsize, thus freeing up large building plots for more dense development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5878  Respondent: 15576673 / Robert Kelly  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): ()

As a local resident living on Tithebarns Lane, I wish to object as strongly as possible to the proposed development for Garlick's Arch. To the best of my knowledge this development has only been mooted very recently. This proposed development will severely impact the surrounding area. Four hundred new housing units plus new ramps on and off the A3 will overwhelm the existing road infrastructure. How can a development of this magnitude be included in the plan at such short notice without significant environmental impact assessments? How can ancient woodlands be turned into a housing estate without consulting local residents beforehand? Is this not a betrayal of faith to all those who chose to move in and around Ripley knowing that it would be protected as a part of the Green Belt? I sincerely hope that this particular development will at least be deferred (if not dismissed entirely as unfeasible) until much more extensive analysis is made available to local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5879  Respondent: 15576769 / Robert Bhoyroo  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:
   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:** PSLPA16/2851  **Respondent:** 15576865 / Mark Phinn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11908  **Respondent:** 15576865 / Mark Phinn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools
I object to the lack of any immediate provision for the doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11905  **Respondent:** 15576865 / Mark Phinn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
| Comment ID:  | PSLPP16/11907  | Respondent:  | 15576865 / Mark Phinn  | Agent: |
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to all erosion of the green belt p2 |
| I object to any "in setting" of any villages from the green belt p2 |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID:  | PSLPS16/5884  | Respondent:  | 15576961 / Jacqueline Edney  | 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 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 the new sites with less than 2 weeks notice |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
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: PSLPA16/2852  Respondent: 15577121 / Nik Badain  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 object to the plans to remove the Green Belt from our local area. Like many people who live in Chilworth, we specifically chose this area because of the green areas around us and wanted to provide an open, natural environment for our children to grow up in. I understand there is pressure to provide more affordable housing, but it is important to keep our green areas for nature and for our own well being. In these changing times when the future seems more and more uncertain, people get a huge amount of well being and enjoyment from being in the outdoors, so it is vital that we keep areas such as this protected from development for all to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5888  Respondent: 15577185 / Matt Mustoe  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 removal of the former Wisley Airfield from the Green Belt, and the proposed increase in housing in our surrounding area.

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 also object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham. This will have a huge effect to our circumstances in Downside, where I live and Cobham. Cobham is the nearest shopping centre to the proposed development and the increase in traffic on the narrow country roads is not acceptable. 2,000 new houses means in my estimation around 4,000 cars (especially as the development is not serviced by mass transit services). These extra vehicles will result in increased traffic jams, weight of traffic at peak times, noise and pollution. In Downside we already suffer with the noise and pollution from the M25 and the MSA, the development of more housing will add to this problem with all of the building site traffic during the construction phase.

I also think it's a tragic shame that the plan calls for the immolation of historic Ockham. This lovely hamlet is set to be subsumed into the developed area with high rise urban style buildings!

The Green Belt was intended and implemented to stop London sprawling. Stop trying to punch holes in it and forever ruining the character of not only Surrey but the whole of the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11920  Respondent: 15577377 / Rachael Hall  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): ()

West Horsley village is a beautiful rural area, which I think is extremely important to maintain. To increase the number of houses by so much, will make it lose its status as a village and will become a densely populated small town.

This plan is reckless and I appeal to those who created it to think again

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11919  Respondent: 15577377 / Rachael Hall  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
The local schools are over-subscribed (and were already oversubscribed when I attended them myself 10 years ago). The doctors surgery is stretched to its limits. The roads are far too busy, with many cars avoiding the motorways and using the village as a bypass. The council is not repairing pot holes that are dangerous - these would only get worse with increasing the numbers of houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am saddened by the proposed plans. This is because I know my experience of childhood may not be experienced by other children again in this village. To propose such a large number of houses is ridiculous and to remove Horsley from the green belt is absurd!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Borough Wide strategy on the basis that the number of homes is unsuitable and the green belt protections are not being respected in my view.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3180  **Respondent:** 15577665 / Grant Angus  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the draft local plan. In particular the severe impact this will have on Ripley village where I have lived for 20 years.

There has been a dramatic increase in traffic over the years and further planned development as outlined in the plan are totally inappropriate and disproportionate. The local road systems are severely congested currently and the plans to take Ripley out of the green belt and allow thousands of houses to be built in and around the village will mean that local roads will become completely gridlocked.

In particular I object to:

Removal of Ripley and other villages from the green belt and the disapprobation amount of development in our area of the Guildford borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6306  **Respondent:** 15577665 / Grant Angus  **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 urge you to consider the views of local residents and rethink the inclusion of these sites in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/6303  Respondent: 15577665 / Grant Angus  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 in the free belt which has recently been overwhelmingly rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6304  Respondent: 15577665 / Grant Angus  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 A43 Garlicks Arch - 400 homes in green belt village I object to A45 Talbot which is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11928  Respondent: 15577665 / Grant Angus  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to all erosion of the Green Belt and the removal of any villages from it.

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 disproportionate amount of development in one area of the borough.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I also object to the lack of evidence for the alleged housing need numbers and what seems to be a total lack of consideration of the local infrastructure that at certain times of the day is already under extreme pressure.</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... with a limited consultation period such as 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:** PSLPA16/2857  **Respondent:** 15577793 / Susan Hughes  **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): ()

There has been no consideration for our locality, our wildlife, our natural beauty, transport impact on our roads and our noise pollution. The proposals in Green Belt area are excessive and will cause huge harm to Green Belt areas such as the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4536  **Respondent:** 15577793 / Susan Hughes  **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): ()

- Our village schools are full, the addition of three more in villages not near us, will not service the increased numbers if the plans go ahead;
- In Horsley cars are already parked dangerously on our roads – often making two way traffic difficult, and this will become all the more so with more cars/buses etc).
- Parking is difficult already – for example our train station is already full – and our small station cannot service more people.
- And drainage is an issue.
- Our doctors are already too busy to cope with daily life of the current inhabitants.

I also dispute the number of proposed houses needed for Guildford’s development: I believe the numbers are significantly higher that official estimates for population growth in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPS16/5891</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): ( )

There are plans again for Wisley – less than 2 miles from us to have a development of 2000 houses – which would also have an enormous negative impact on transport and other infrastructure.

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 proposal for the number of houses is disproportionate to the services we can provide – even with the few additional services the plan references.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11933</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
No satisfactory ‘exceptional circumstances’ have been given for the proposal to remove the Horsleys from the Green Belt. The removal of much village area from the Green Belt is without explanation or due consideration. I can see no due consideration given to Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11935  Respondent: 15577793 / Susan Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to the excessive plans, there are no constraints or attempts to limit development. I understand that the plan proposes enlarged village boundaries – for no reason other than the potential further development of land.

The plans will cause irrevocably damage our environment and our Green Belt, for little benefit: I doubt the need for so much development. There is no satisfactory plan for appropriate infrastructure. The plans are excessive and without constraint.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2862  Respondent: 15578241 / Cheryl Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to voice my objection to the plan from the green belt.

There are ample brownfield sites available. We do not want urban sprawl.

Not least the harmful impact on the strategic road network the A3 and M25 on an already overcrowded road with many accidents. Plus the air pollution would be worst at an area which exceeds EU permitted limits.

There is NO suitable public transport and local stations are already overloaded. They are citing Cobham as the nearest station which is a complete joke.

The Planning officers have agreed on the identified concerns

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 appreciate that a lot of work has gone into this local plan but I AM TOTALLY OPPOSED TO BUILDING ANY HOUSES ON GREEN BELT LAND.

This land needs to be preserved

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11973  Respondent: 15578433 / Sari Negus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11975  Respondent: 15578465 / Jan Ellis  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): ()

Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion. I travel in from Gomshall every day and there is already a considerable backing up of traffic entering Guildford via the Epsom Road. This would be horrendous if the proposed level of new house building was to go ahead. Bus and train services from outlying villages are virtually useless as there are not enough of them and not often enough. I would be more inclined to use public transport if the buses and trains came more frequently than every 1 or 2 hours....
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11976  Respondent: 15578465 / Jan Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I oppose unjustified Green Belt development. Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11974  Respondent: 15578465 / Jan Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter. There is flawed evidence exaggerating the need for expansion, as shown clearly by the GRA report on housing, furthermore, expansion should be limited to protect the character of town and country in our congested gap town. It is unacceptable that, unlike other towns, Guildford is choosing not to constrain its overall housing growth – why is this?

I would beg you to reconsider your proposals and reduce the expansion of Guildford to an acceptable, practical level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2873  Respondent: 15578497 / Jane Long  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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<td>1.</td>
<td>I object to Guildford Borough Council having not followed the correct process. Since 2014 GBC has changed every major site in Send proposed for development, and have now added a massive major new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185, and has now gone up again to 485. These significant changes require another full consultation under regulation 18, not the short cut of regulation 19 which GBC are trying to get away with. This invalidates the whole process.</td>
</tr>
<tr>
<td>1.</td>
<td>I object to the evidence - GBC have 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 means that industrial space at Burnt Common is no longer needed. as numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required number of 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, 8,000 new homes are actually needed (based on 2.5 persons per home). The Green Belt does not need to be built over. 50% of the new homes could be built on brownfield sites. GBC's Transport Assessment was not even available to councillors for the vote taken on May 24th, havinf been published on 6th June. The overload to the infrastructure has been given scant consideration.</td>
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<tr>
<td>1.</td>
<td>I object to Policy P2 - Send should not be removed from the Green Belt. Send provides a buffer between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include (i) the land behind the school, including playing fields and woodland; (ii) the land to the right of Cartbridge by the Wey Navigation up to the new boundary fence with Vision Engineering; (iii) land to the left of Cartbridge going up to the old depot on the Wey navigation.</td>
</tr>
<tr>
<td>1.</td>
<td>I object to Policy A43 - 30ha land at Garlick's Arch, Burnt Common designated for 400 houses and 7,000m2 of industrial and warehousing. There is no need for any more houses on top of the 13,860 already proposed for the Borough. This site is new and was not included in the Regulation 18 draft and has not been consulted on previously. It is Green Belt permanently protected by the NPPF which prevents further merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered with ancient woodland. Trees which existed in the 16th Century would be gravely endangered. The proposed industrial development of 7,000m2 is simply not required since the last ELNA in 2015 shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000m2 of industrial space it should be at Slyfield. A new four-way interchange onto the A3 at Burnt Common would be disasterous for Send. The traffic in Send Road (A247) would be gridlocked all day. Send would become the through route to Woking for traffic leaving the M25 and A3, the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. The village of Send simply could not take this.</td>
</tr>
<tr>
<td>1.</td>
<td>I object to Policy A44 - 1.9ha land west of Winds Ridge and Send Hill designated for 40 homes and 2 Travellers pitches. This site is new and was not included in the regulation 18 draft and has not been consulted on previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existinf site containe documented unsafe landfill waste which is currently vented. The proposal to include 2 Travellers pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site.</td>
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</tbody>
</table>
| 1. | I object to the building of 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. Tannery Lane is far too narrow and 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 granted for 64
appartments at the Tannery and for building the Marina, both of which will generate additional heavy traffic. The lane simply cannot take any more. The junction is already too dangerous and will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2874  Respondent: 15578529 / Jeff Dawson  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 local plan as it pertains to the village of Send, where I have lived for the last 25 years. I would like my comments to be seen by the Inspector please.

I object in particular to the number of new homes planned in total (485) without adequate consideration having been made to improving the local infrastructure to support the new residents. In particular I do not believe the main road through Send can support the extra traffic likely to arise. While I understand some money has been put aside to improve the road, it is far from clear what realistic improvements could be made, and this is already a very busy road and bottleneck during the rush hour. The additional housing together with a proposed new junction with the A3 will clearly exacerbate this existing problem. If this quantity of housing is really to be considered, then some way for traffic to by-pass the village in order to get to Woking or places further north would be required. In addition there appears to have been no plan to improve the schools in the village or the medical centre facilities, which are therefore likely to be overwhelmed.

I also object to Send being taken out of the green belt area. This will only encourage further in-building, further aggravating the existing problems.

Finally, I object on the basis that these plans overall are likely to change the rural nature of the village and surrounding areas, therefore significantly adversely affect life in the village. I am not convinced that this degree of building is required on green belt land, when there are brownfield sites still available in Guildford and other areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2875  Respondent: 15578561 / Catherine Thiesson  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 voice my strongest objections to the proposed plan to build on West Horsley’s Green Belt. Whilst I fully understand the need for more housing in the area for the ever increasing population, I would beg you instead to use “brown field sites” and conversions of existing, unused properties in order to preserve our precious and vital Green Belt landscape. The vast number of proposed houses would simply massacre this area of outstanding natural beauty and the pressure from developers must be fought with all possible strength, integrity and respect for our fragile natural environment. The village would be destroyed forever by such a massive strain on it’s resources, both natural and social.

I urge you, please, to stand by your previous pledge to protect the Green Belt and to find alternatives that respect the precious beauty and character of the area so that it is protected for generations to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2879  Respondent: 15578721 / Millicent Hughes  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 you about my objections to the proposed Guildford Borough Council Local Plan 2016. I consider it relevant, as a resident of West Horsley, to state my opinions on this matter.

Removal of the Horsleys from the Green Belt

Firstly, I object to the Horsleys being withdrawn from the Green Belt. The Green Belt was established for the main reason of preserving England's rolling hills and green pastures for generations to come. Horsley is a rural village and was even given the name "horse meadows" as a result of it being so green and agricultural. It should be kept this way to protect its rich heritage. By removing it from the Green Belt, it would no longer be the country village that we know and love and I strongly object to this.

Over-population

Secondly, our villages are at maximum capacity. The suggested developments will put further strain on public transport, such as the trains at Horsley station, which I object to.

Furthermore, I object to there being insufficient parking space in the villages if vehicle numbers increase.

I also object because drainage will become more of an issue when already congested main roads become even more flooded than they presently are due to an increase in water waste and sewage.

Infrastructure overload

Tying in with overpopulation, our public services will completely overflow as they are not being suitably developed to meet the needs of a 35% increase in housing.

I object because children will be forced to go to school further afield because there is no space locally.

Residents will receive poor healthcare because the medical clinics are full and so I object to this as well.
I object because the road traffic will be even worse and the community buildings will be busier than ever.

In conclusion, I object because the large number of new houses being proposed in this plan is unsustainable, unsuitable and certainly unwarranted in the Guildford boroughs, particularly the Horsleys, for the reasons I presented in this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2881  Respondent: 15578753 / Andrew Needham  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 on the following points:

1. The Housing number of 693 is far too high. The SHMA calculations on how this number was reached have not been provided (and we have been asking for two years). Nobody in the council has checked it (or that is what the council have told us). Resident cannot check the calculation as GBC have refused to provided it. We are taking the number on trust from a company called GLHearn who represent developers, and boast on their web site they solve developer problems.

2. Constraints on the housing number NEED to be applied as allowed but have not been. Guildford is 89% Greenbelt, 44% Area of Outstanding Natural Beauty, yet our roads are gridlocked and that is TODAY. This plan will not fix that just make it worse that is 14000 houses at 2 cars per house... on our roads extra!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12002  Respondent: 15578753 / Andrew Needham  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): ()
Sewage and water provision risks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12001  Respondent: 15578753 / Andrew Needham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The transport evidence is very weak and major transport issues are unresolved e.g. another river crossing in the town, a central bus depot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11999  Respondent: 15578753 / Andrew Needham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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. There should be NO BUILDING ON THE GREENBELT without local resident agreement. This greenbelt destruction is robbing the next generation of their heritage and driving up pollution and traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12000  Respondent: 15578753 / Andrew Needham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Brownfield opportunities are being ignored, or assigned elsewhere – we need more homes in the town centre (not 40% more shops), and much more accommodation on campus for students, and homes for the elderly to free up family houses. The University needs to build the student accommodation it promised in 2003. The University impact needs to be allowed for and managed in this 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: PSLPP16/12003</th>
<th>Respondent: 15578753 / Andrew Needham</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There has been no consultation with local residential bodies such as Resident Associations or Parish Councils.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2884</th>
<th>Respondent: 15578785 / Bailey Donnell</th>
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<tr>
<td>Document:</td>
<td>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): ()

My understanding is that Horsley to be taken out of the Greenbelt there has to be an exceptional case. I have neither seen or heard any case being made that shows an exceptional circumstances so surely it cannot happen.

I have lived in Horsley fro 13 years. It is a lovely village and with all the proposed developments locally it will be destroyed beyond repair. This cannot be allowed to happen.

I love cycling around our local village and roads and with all the new houses, cars that will come it will not be as safe and there will be accidents
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5924  Respondent: 15578817 / Shirley Annan  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): ()

I object strongly to site a22 Keens lane worplesdon.

This is green belt, roads can not cater for any more traffic, all ready have extensive building in Keens lane, losing room for our wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3047  Respondent: 15578817 / Shirley Annan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / 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): ()

I strongly object to the extra proposed houses on the A22 Keen’s Lane site as I did earlier plans.

1. There will be no corridor for wild life.
2. The main roads are already grid locked.
3. The local lanes are already getting dangerous with the already mounted traffic.
4. The doctor’s surgeries are now stretched to the limits as waiting time to see a doctor is getting longer

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12013  Respondent: 15578849 / Jo Kulp  Agent:
I am writing to object to the new local plan the Guildford Bourough Council is suggesting to propose removing green belt protection from the villages of Chilworth and Shalford. These villages are in areas of countryside of outstanding natural beauty that locals and visitors alike enjoy spending time in, it is vital to our wellbeing, and it would be a travesty to remove the green belt protection from this land. I strongly object to the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5929  Respondent: 15578881 / Robert Leishman  Agent:

I have been a resident of West Horsley, a wonderful village, for the past 18 years and am totally opposed to the villages potential removal from the Green Belt, then “insetting” and extending the 2003 Local Plan Settlement Area boundaries, in particular with regard to the Proposed development site at Manor Farm.

With the potential of 135 new homes to be built on the Manor Farm site, and given that the majority of households these days have 2 or more cars, (and increase of 270 cars & journeys on the road each day) I and most residents believe this would create an unsupportable issue for:

- Schools
- Road networks
- Local traffic and local journey times for schools, shopping and the journey to the station would become greatly increased and unsustainable for commuters
- Parking in the village and at the station
- Medical Services
- An increased danger to cyclists and pedestrians

I believe an increase in housing at Manor Farm (let alone any of the other sites in the plan) will fundamentally not work, and irrevocable change the balance in the village to a completely unsupportable and unsustainable level.

I OBJECT to the proposal for Manor Farm laid out in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Before going into detail, I would like to preface my comments with some general observations about the whole process. It is widely recognised that the country’s economy is out of balance and that too much business activity and supporting population is concentrated in London and the South East. It seems perverse, then, to exacerbate the problem by creating excessive development in the South East, putting further pressure on the region.

There are other factors and constraints that need to be considered, especially the impact of Brexit on population figures and infrastructure funding, and the possibility of a third Heathrow runway, which would result in an enormous increase in traffic in the area. In addition, the Royal Horticultural Society is planning a major re-development of its headquarters at Wisley which will result in more visitors and traffic, putting further pressure on the A3 and nearby intersections. An increase of 25-30,000+ in the local population would cause intolerable strain on the Royal Surrey County Hospital, itself already under pressure.

The borough of Guildford is not an ‘island’. Development within the borough has impacts on surrounding boroughs and areas in terms of traffic, housing demand, infrastructure and so on. The reverse also applies. The piecemeal approach of the Local Plan process means there is no strategic planning, covering a much wider area, including London.

Taking just one example, the A3 serves a number of boroughs throughout its length and any development planned along its route by other boroughs will have a major impact on Guildford borough. To this extent, the entire process is flawed.

Housing assessment - I OBJECT

The Housing Minister Brandon Lewis has been quoted as saying: ‘Picking housing numbers out of thin air and imposing them on local communities builds nothing but resentment’. It is a pity GBC failed to hear him.

The Local Plan is formulated on an SHMA which has been based on a methodology unknown and unscrutinised, even by the Council. It is complete folly, therefore, to produce a ’plan’ on such a basis.

Moreover, it has been produced by an outside company which is part of a major property and development business, thereby negating its objectivity.

The figure of 693 homes per year is substantially higher than the 2014 assessment and more than double that of the 2003 plan. Further doubt about the accuracy of the figure arises because of the Council’s previous actions in relation to the South East Plan. GBC made a successful legal challenge against the then Government’s proposal for 422 homes per year but now vigorously promotes 693 homes per year. At the time of the legal challenge victory, a senior Councillor said: ‘Our successful challenge means that local concerns have now been heard and taken into account when planning the future of our borough. …It is reassuring that the South East Plan housing targets which many felt would have prejudiced the
character of the borough no longer apply. Why is the Council not hearing the local concerns now and why is it not fearful of a massive change in the character of the borough with such a high SHMA?

Furthermore, the SHMA is increased by GBC to give a population increase almost 70% higher than official ONS estimates for population growth in the borough. This, for example, results in an increase of 35% in existing West Horsley households. At present, there are 2,808 homes in both East and West Horsley: if the Plan is accepted as it is, there will be AN EXTRA 5,000 homes within five miles, including 600 in the Horsleys. Overall, the Plan proposes more than 8,000 new homes in the Green Belt but only about 1,100 in the Guildford urban area.

It is generally recognised that there is a chronic shortage of social housing and of one or two bedroomed properties for sale or rent in the borough. Moreover, there is a need for homes, particularly bungalows, for elderly people wanting to downsize and stay in the area. There appears to be nothing in the Plan to address these issues, except the aspiration for 40% affordable homes in the larger developments. With the current level of house prices in the borough, it is doubtful that many would-be buyers would be able to afford an ‘affordable’ property or an ‘affordable’ rent. Also, developers are renowned for using their ‘get-out card’ to avoid building ‘affordable’ homes. There appears to be a serious mismatch between the housing need and where and how it could be met. Rather, the Plan simply gives a green light to developers to build all over the Green Belt and to plan for future ‘easy’ growth.

The unjustified and inflated housing figure will cause unacceptable pressure on local infrastructure and result in a complete change in the character of the borough. The Council appears to be ‘going for growth’ for growth’s sake, ignoring its own past views as well as those of current residents. Overall, its Plan would ‘urbanise’ the borough, extending the sprawl of London and its suburbs to Guildford and beyond.

To minimise the need for huge infrastructure developments, most housing growth should be accommodated within Guildford itself, leaving the borough’s villages to grow organically.

In its desire for ‘forced growth’, GBC has utterly failed to consider the constraints to development and the SHMA figure, such as the Green Belt and need for infrastructure, which if employed would result in a much more realistic and sustainable scale of development and one in keeping with the borough’s character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5935  Respondent: 15578977 / Norman Evans  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The former Wisley airfield is entirely unsuitable for use as a new ‘town’. The site was requisitioned by the Government for wartime purposes with a promise that it would be returned to agricultural use in due course - that promise should now be honoured. The land is Metropolitan Green Belt land except for about 15% consisting of the old concrete runway and apron.

A planning application for temporary use of the site for filming was rejected in 2014 and later refused on appeal, the Inspector stating that the development would be detrimental to the Green Belt and would likely cause harm to local environmentally sensitive sites. A much more substantial planning application for a small town of some 2,100
homes, medical centre, schools and supermarket was last year submitted by the owner, Wisley Property Investments, but was recommended for refusal by the Council officers and then rejected unanimously by a special meeting of the Planning Committee, who totally agreed with the 14 main reasons for refusal by the officers. I will not list all the reasons here because the Inspector will have access to the Council’s files, but my objections include:

- loss of Green Belt
- loss of good quality agricultural land
- danger to nearby environmentally protected sites
- totally unacceptable traffic problems, including dangerously high pollution
- no infrastructure and no transport links (except A3)
- overdevelopment and unacceptable housing density
- five-storey buildings, totally out of keeping with the Surrey countryside
- detrimental impact on Surrey skyline and increase in light pollution.

I will emphasise the traffic problems this development would cause. Some 4,000 cars would be added to the area’s roads, causing more congestion on the A3 into Guildford and at the junction with the M25 (J10), where pollution levels often exceed permitted levels already and are too high to allow schools to be built on the site. The proposed new A3 junction at Wisley would have to accommodate a large increase in traffic from all directions, while Ripley and East Horsley would be seriously affected.

The fact that the scheme involves local road closures and one-way streets is a clear demonstration of how impractical the scheme is. The Council’s comprehensive rejection of this scheme renders any large-scale development of the site out of consideration: it is not practical, viable or sustainable. Indeed, the Council’s Leader and Lead Councillor for Planning said the scheme failed the Council’s sustainability test ‘dismally’. Why, then, has the Council not removed the site from the Local Plan which would be logical in light of its fundamental unsuitability? I merely point out that Wisley Property Investments has links to the Conservative Party, including its ‘front man’ who happens to be the lead councillor for planning for the Conservative-controlled Vale of the White Horse District Council in Oxfordshire.

The site should continue to be used for agricultural purposes, while the runway and apron could be used for a solar farm or for hydroponic horticulture (no need to remove the eight-foot deep concrete at great expense

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12021</th>
<th>Respondent: 15578977 / Norman Evans</th>
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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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The Plan proposes to designate Station Parade, East Horsley, as a ‘district centre’ which would make it vulnerable to future urban development. This is an impractical proposal since there is nowhere for any development to be built without the destruction of existing homes and premises. I also object to the inclusion of Kingston Field as a site for possible development. This is a very important local space and a valuable community asset which should remain untouched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12020  Respondent: 15578977 / Norman Evans  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): ()

Every university has a basic duty to provide as much accommodation for its students as possible. Surrey University already has planning permission for a thousand or more housing units for student accommodation and has other land in its campus which could be used to house its students. If the University implemented its permission and built further accommodation, it would release thousands of housing units in the town for ordinary residents. Its proposal for building on Blackwell Farm is opportunistic and profit-seeking, destroying Green Belt land on Hog’s Back, a well-known scenic attraction. A recent independent survey has concluded that the Blackwell Farm site should be included in the AONB: I agree

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12022  Respondent: 15578977 / Norman Evans  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 2016 Plan is completely unacceptable. The Council has totally ignored the comments and suggestions of residents and proceeded with an outrageous assault on the Green Belt for which they have absolutely no mandate - in fact, the very opposite. The housing target is excessive and needs to be seriously reviewed, especially in light of Brexit, and a new plan needs to emerge based on actual housing needs with the right kind of accommodation in the right places, and a plan that requires the least amount of infrastructure developments. If the current Plan proceeds, it will lead to massively increased traffic congestion and pollution levels, require a huge amount of public expenditure, and destroy the character and beauty of an attractive and much-loved area.

Above all, we need a Plan that supports local needs and not the balance sheets of developers.
The addition of nearly 14,000 extra homes and 25,000 to 30,000 people has very serious implications for infrastructure and traffic, which the Plan hardly addresses and for which there is little funding (if any) - schools, medical centres, drainage, sewerage and so on, but particularly roads. The impact of Brexit is yet to be fully felt, but will almost certainly limit public funding even further and developers will be reluctant to commit to new developments in an uncertain market. If the Plan is implemented, it will lead to an increase of around 25,000 to 30,000 vehicles, plus extra traffic generated by developments in other boroughs and by normal traffic growth. The borough’s roads are already overcrowded at particular times and many are in a state of poor repair. Moreover, away from the main arteries, the back roads are often little more than lanes - narrow and with no pavements. For them to safely accommodate all the extra traffic, there would need to be many road changes and adjustments, requiring more road furniture, pedestrian crossings, traffic controls and so on, all having a detrimental impact on the character and nature of our environment, aside from costing a huge amount.

The borough’s main artery, the A3, suffers considerable congestion now, particularly on the southern approach to the town’s turn-off, southwards at the hospital exit, and northwards at the junction with the M25, where pollution levels often exceed permitted levels. The Plan proposes more access to and from the A3 with a four-way junction at Burnt Common and further access at the Wisley junction (see item 6) to accommodate traffic from proposed new developments. These will only increase the number of vehicles using the road, adding excessive traffic levels, increased congestion and pollution. (There has been talk of building an A3 tunnel under Guildford, but this is a pipedream with no realistic prospect of ever being built, especially because of the huge cost, for which there is no planned funding).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12019  **Respondent:** 15578977 / Norman Evans  **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 ruling party on GBC has acted dishonestly and dishonourably over the Green Belt. Having promoted its protection at every election for decades and made the same pledge last year, it now claims it has ‘listened’ to the people of Guildford, yet produces a plan barely different from the 2014 version but which includes widespread development - TWO-THIRDS of which is on Green Belt land. This is contrary to their own policies, those of central Government and those of the NPPF. The Council even has the gall to include in its Plan the sentence: ‘We will continue to protect the Green Belt’!

The new Plan also includes removing about 15 villages in the borough from the Green Belt and changing the Green Belt boundaries. There is no justification for this except to facilitate future development. Removing Green Belt status from villages will leave them vulnerable to excessive development and result in the merging of villages causing an ‘urban’ sprawl, exactly the outcome the Green Belt was designed to protect.

At the last General Election, the Tories’ manifesto promised to protect the Green Belt and to retain the rules governing it. These state that development can only be allowed on Green Belt land in exceptional circumstances and that housing need does not count as sufficient reason.

They also say that Green Belt boundaries cannot be changed or moved, again except in exceptional circumstances. GBC have not given a single reason why there are special circumstances for sacrificing so much Green Belt land. Why do they think that the rules do not apply to GBC, especially when only a few years ago they made a legal challenge to protect the borough’s Green Belt?

The Plan’s totally unacceptable assault on the Green Belt will, in effect, destroy the concept of protection throughout the borough and beyond. It must be resisted if we are to retain the sort of countryside that the British know and love - and want retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to Guildford Borough Council’s Local Plan on the grounds that it represents serious over development, is based on inaccurate, unscrutinised housing figures, and means a massive, unacceptable destruction of Green Belt land. It would also require a huge amount of infrastructure and attract thousands of extra vehicles, placing undue pressure on local road networks, as well as causing extra pollution.

Furthermore, it would completely change the character of the borough, harm the environment and seriously damage the quality of life for residents. As our local MP has said, the Plan is ‘not fit for purpose’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### 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 wish to object to the proposed signalised junction of A31 and Down Place and its use as the main vehicular access for the Blackwell Farm housing development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/12016  Respondent: 15579009 / Patricia Lines  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): ( )**

Re: Primary Vehicular Access via Existing or Realigned Junction of A31 and Down Place access road, to be signalised

As a Hogs Back resident, I have received your notice drawing attention to these plans and wish to record that I object to these plans.

Whilst I appreciate the need for building new homes, it isn’t the actual development which is of concern but the seeming lack of proper and informed consideration to the infrastructure to support the development.

To try to install ANY form of access up to the A31 is only adding to the existing problems currently experienced along the Hogs Back stretch of the A31 and will have repercussion on all the surrounding villages, not only to the north side but also to the south side, including Puttenham and Compton.

To add to the existing weight of traffic on this section of road will force drivers to look to alternative routes into Guildford, with the consequence that the routes through the villages will also become deadlocked and dangerous.

This should not just be about the convenience of the new home owners/tenants to be installed in the new development, allowing them quick access to the A31, but also about the existing residents of the surrounding villages.

Sufficient provision should be made to the north, west and east of the development to move the additional weight of vehicles AWAY from this already congested area.

The effects on the existing residents and indeed the natural environment could be immense and presumably irreversible. The Hogs Back stretch of the A31 already suffers from numerous problems which the Council seems intent on ignoring at every turn, despite the residents’ efforts to be heard and not railroaded.

I have noticed there have been environmental study boxes installed along the Hogs Back – please could you advise who has installed them as I would be extremely interested to hear more about their findings.
If you can give me any direction in this matter, I will gladly take up my own further research.

In the meantime, I again reiterate MY OBJECTION to this access route.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2892  **Respondent:** 15579073 / Ben and Margaret Cross  **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 raise my concerns for the planning proposals that you will be hearing for the Horsleys.

My reasons for concern are:

1) Schooling - schools are already full.

2) Medical centre is full to capacity.

3) Sewage farm at Wisley would need to be enlarged.

4) The roads and carparking would need adjusting for the amount of housing that has been proposed. Carparking at the station already overflowing.

5) Proposed housing on Ockham Road North would cause danger by the bridge.

6) I agree that some housing does need to be carried out but this must take into consideration affordable housing for local families and single people.

7) Please leave the Green Belt 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:** PSLPA16/2908  **Respondent:** 15579073 / Ben and Margaret Cross  **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 raise my concerns for the planning proposals that you will be hearing for the Horsleys.

My reasons for concern are:

1) Schooling - schools are already full.
2) Medical centre is full to capacity.
3) Sewage farm at Wisley would need to be enlarged.
4) The roads and carparking would need adjusting for the amount of housing that has been proposed. Carparking at the station already overflowing.
5) Proposed housing on Ockham Road North would cause danger by the bridge.
6) I agree that some housing does need to be carried out but this must take into consideration affordable housing for local families and single people.
7) Please leave the Green Belt as it is.

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 increase in dwellings in East and West Horsley

The number of extra houses proposed for these sites is way out of proportion with what the villages could cope with - the huge number of people could not be accommodated by the local amenities - I see no plans for extra schools, or medical facilities. The small roles could not handle the increased level of traffic, and the stretch of shops in Station Parade, which is already crowded at many times of the day, would become unmanageable. Furthermore, this would totally change the character of the villages - currently small and local, the area would start to feel like more of a 'town', but without the infrastructure to support that

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: PSLPP16/12026</th>
<th>Respondent: 15579105 / Lucy du Preez</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): ( )**

I object to building on Wisley Airfield.

This plan has been poorly thought out - the proposal to build over 2000 houses on this site, adjacent to the tiny village of Ockham, will cause immeasurable damage to the surrounding area. It would totally change the character of the area, and have an enormous negative impact on residents of all the local villages. RHS Wisley and the Thames Basin Heath Special Protection Area are adjacent to this site - these are extremely important nationally in terms of promoting and protecting wildlife; the construction of a new town nearly on top of these areas would be extremely damaging.

**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 to the extra housing proposed on the basis of transport limitations

Commuting from Horsley and Effingham Junction stations, where the parking is already full, would become unmanageable. The local road network is not sufficiently developed to cope with the huge number of extra cars that would be inevitable with this increase in housing - quite apart from the extra noise and air pollution to local residents, there is a real risk of bottle necks being created at junctions on and off the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to an alteration in the Green Belt Boundary, such that several local villages currently inside the Green Belt will now fall outside, and will inevitably be developed into 'suburbia' in the years to come.

Maintaining the Green Belt in the UK is absolutely crucial; whilst I understand that the population is increasing, and therefore space needs to be found to build new houses, I absolutely disagree that this should be done by sacrificing Green Belt. Green land is so important for the health and wellbeing of the population; and vital habitat for flora and fauna. Once land has been taken out of the Green Belt, it is inevitable that it will become fully occupied by buildings in years to come - this is something we can never take back. We moved to Horsley because we wanted our children to be able to enjoy the space and countryside; we have many friends who, for work reasons, need to live in more urban areas. But they still make the effort to travel out to the Green Belt during weekends and holidays, as they also value this space for their families. This area of green belt also attracts visitors and tourists from around the UK and abroad - it would totally lose this appeal if it were to be gradually urbanised. I strongly feel that reducing the size of the Green Belt is an extremely short-sighted and ill thought out solution to the housing problem, and should be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5944  Respondent: 15579137 / Nicodemus Brian Rhyner  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: PSLPS16/5946  Respondent: 15579137 / Nicodemus Brian Rhyner  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?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land 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: PSLPP16/12035  Respondent: 15579137 / Nicodemus Brian Rhyner  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: PSLPP16/12032  Respondent: 15579137 / Nicodemus Brian Rhyner  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:  PSLPP16/12037  Respondent:  15579137 / Nicodemus Brian Rhyner  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:  PSLPP16/12038  Respondent:  15579137 / Nicodemus Brian Rhyner  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 (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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to poor air quality concerns (Policy 13)</td>
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<td>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.</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 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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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: PSLPP16/12028  Respondent: 15579137 / Nicodemus Brian Rhyner  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: PSLPP16/12034  Respondent: 15579137 / Nicodemus Brian Rhyner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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: PSLPS16/5948  Respondent: 15579265 / Henry Lyon  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 speak on behalf of young people in Normandy about the proposed development.

I have lived here all my life and in that time I have noticed how congested the roads have become. As a cyclist, I would hate to see more traffic on the road and the traffic the new development would bring would increase the dangers of cycling. I appreciate there are bridleways but not every journey can be taken using bridleways.

I don’t understand why there will be a new school on the land which is mostly waterlogged throughout the year. Firstly they will struggle with playing any sort of sport on this consistently wet land and also the local schools in the area are undersubscribed. It seems the only reason for building a school might be a way for the developers to look favourably on their application. Which in some cases might be described as using a sweetener in order to get a contract.

Furthermore, the whole time I have lived here the land has been used by farmers showing that it is good agricultural land. Not only that, as I have grown up I have enjoyed the various forms of wildlife that this area has provided. Some years we are lucky enough to have barn owls, there are always tawny owls, deer, badgers, foxes and rabbits and also lizards and grass snakes. This very weekend, I found glow worms in the field. Along with these creatures there are also many birds that frequent this area including migrant birds that return each year. The ecology of this area would be greatly damage by the proposed development.

Having spent my whole life living here, I cherish this open green space and all the memories of childhood I have here. I hope you consider very carefully what you will be losing if this development goes ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5950  Respondent: 15579329 / Caroline Scott-Plummer  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 am writing about the plans for a housing development on a greenbelt site. The government is always saying that brownfield sites will be used, and yet there seems to be an ever increasing number of developments.

The objections are the following:

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:
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: PSLPS16/5955 | Respondent: 15579361 / Caroline May | 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:
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: PSLPP16/12051  Respondent: 15579361 / Caroline May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the 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: PSLPP16/12047  Respondent: 15579361 / Caroline May  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): ()
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:** PSLPP16/12048  **Respondent:** 15579361 / Caroline May  **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): ()

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:** PSLPP16/12049  **Respondent:** 15579361 / Caroline May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E5 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: PSLPP16/12062  Respondent: 15579361 / Caroline May  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 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.

14. 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: PSLPP16/12053  Respondent: 15579361 / Caroline May  Agent: 15579361 / Caroline May

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:
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: PSLPP16/12058  Respondent: 15579361 / Caroline May  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: PSLPP16/12060  Respondent: 15579361 / Caroline May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12045  Respondent: 15579361 / Caroline May  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / 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: PSLPP16/12046  Respondent: 15579361 / Caroline May  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): ()

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: PSLPP16/12043  Respondent: 15579361 / Caroline May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact 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 unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to
increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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: PSLPP16/12044  Respondent: 15579361 / Caroline May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be 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 Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/5954</th>
<th>Respondent:</th>
<th>15579393 / Leonard Beighton</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): ()

Objection to Guildford Borough Council draft Local Plan (June 2016)

and to the inclusion in the Plan of the development at the former Wisley Airfield site.

I wish to object to the inclusion in the draft Local Plan of the development of 2,000 dwellings at the former Wisley Airfield site.

It seems bizarre to see the site included in the draft Plan since it was only in April that the Council itself turned down an application for a development which in essence was similar to that in the Plan. Presumably therefore the Council then accepted most if not all of the objections to the application: these apply equally to the development outlined in the draft Plan.

I shall list here only those issues which would impact in particular on Cobham. Those who live in the Borough of Guildford will doubtless have many other concerns in addition.

First, the Wisley Airfield is in the Green Belt. It is an essential part of the purpose of the Green Belt to prevent continuous urban sprawl. If this site were to be developed, there would be pretty well continuous development between London and Guildford. The Council should look instead for the development of brownfield land which needs regeneration.

Second, the transport infrastructure in the area is already under very considerable strain and cannot take more. The Wisley Airfield development would be likely to bring into the area an additional 4,000 cars plus all the HGVs, vans, and so on required for servicing the households in the area.

It is true that over the next few years Junction 10 of the M25 is to be remodelled, but this is to cope with the present traffic and any likely expansion which can already be foreseen, not yet further additions. In any event, that would not help with other current tailback issues such as at the junction of the A3 at Painshill with the A245 and at the junction at Esher/Oxshott with the A244.

There would also be additional strain on the narrow local roads. There is very little public transport and the large majority of residents would have to use their cars.
Third, air pollution. Parts of Cobham already have high levels of air pollution. It would be likely that Cobham would be used by the residents of the Wisley development as its nearest shopping centre and this would add yet further to the pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/8331</th>
<th>Respondent: 15579457 / RSPB South East Office (Heather Richards)</th>
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**Appendix 1**

**To which section of the plan (paragraph/policy/map/table) does this comment relate?**

Policy A35: Land at former Wisley airfield, Ockham

Do you consider this section of the plan is legally compliant? No

Do you consider this section of the plan is sound? No

Do you consider this section of the document complies with the Duty to cooperate?  

**RSPB Comment:**

For ease of reference we deal with all of our concerns with the proposed allocation of the former Wisley airfield (A35) for development here, including the relevant provisions within the Habitats Regulations Assessment of the Submission Plan.

The RSPB considers that there are inherent inconsistencies between the stated aims of the Plan and the inclusion of the former Wisley airfield which are central to the overall soundness of the Plan. The Foreword to the Plan states that:

“It also outlines how we will conserve and enhance the unique qualities of our natural and built environment, especially in the Surrey Hills Area of Outstanding Natural Beauty and Thames Basin Heaths Special Protection Area. This Development Plan Document sets out how we propose to meet these conflicting demands” (p5).

The Foreword continues:

“Whilst we will conserve and enhance our special landscapes, the Local Plan aims to balance protecting the borough’s unique environment with meeting our social and economic needs.”

The RSPB submits that this statement gives a clear expectation that protection will be accorded a higher priority than development in circumstances where there are conflicts between the need to provide housing and the need to protect nature conservation interests. A key factor is that existing protected areas must be conserved in situ, whereas there is greater flexibility to decide where future housing allocations will go.
The RSPB notes Strategic Objective 6 of the Plan: “To protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty for their biodiversity and landscape characteristics.” In addition we note Strategic Objective 7: “To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates and is adapted for, climate change.” All of Strategic Objective 6, and the first part of Strategic Objective 7, are pertinent to the proposed allocation of the former Wisley airfield. The RSPB consider that the inclusion of the former Wisley airfield represents a clear failure by the Council to meet its requirement to conserve its internationally designated areas and has placed development demands first, and is a failure to meet the strategic objectives it has set itself. These clear internal inconsistencies demonstrate that the Plan is not the most appropriate when considered against reasonable alternatives and that the Plan consequently fails the “justified” test of Soundness.

The RSPB notes that policy S1, Presumption in favour of sustainable development, states:

“We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental considerations in the area.”

However, this does not mean that it will be possible to find appropriate solutions to allow the development to go ahead.

Policy H1, Homes for all, makes it clear that “Sites should not significantly impact on the visual amenity and local character of the area or adversely affect an environmentally sensitive location.” We contend that this policy presumption should be applied throughout the plan, with a key bearing on the evaluation of sites that are proposed for inclusion as allocations within the Plan.

We note that the supporting Policy P2, Green Belt, 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.” (para 4.3.14). However, a visit to the former Wisley airfield clearly indicates that, aside from a runway and adjoining apron that the site is clearly open in character, a fact borne out that the first reason given by the Planning Officer’s report into the Wisley application recommended refusal for the “clear and substantial detrimental impact on the openness of the Green Belt” (Officers’ Report, para 2.1).

We note the following statement in Topic Paper “Green Belt and the Countryside”:

“Given the significant constraints that exist to the north and south of the borough (Thames Basin Heaths Special Protection Area and Surrey Hills Area of Outstanding Natural Beauty), we are left with a ribbon across the central part of the borough that remains potentially suitable for development.” (para 4.66)

On the basis of this statement from the Council, the RSPB questions why the decision has been made to ignore the constraints highlighted here and to propose removing the former Wisley airfield from the Green Belt for the provision of housing, particularly given its proximity to the Thames Basin Heaths Special Protection Area.

Later on, the Topic Paper states:

“Part of the extended Green Belt land is proposed to be designated as Suitable Alternative Natural Greenspace (SANG) which will be retained as open space in perpetuity. This is consistent with the objectives of the NPPF to enhance the beneficial use of the Green Belt.” (para 4.94)

We contend that there are clear tensions between this statement and the provisions set out within the Plan to release existing green belt land for delivery for a major development and SANG, which appears to be developing green belt land for housing at the Wisley airfield site, with attendant risks to the Thames Basin Heaths Special Protection Area, whilst at the same time proposing to turn land into SANG and add it to the green belt. This adds further support to our contention that the Plan is not the most appropriate when considered against reasonable alternatives and that it therefore fails the “justified” test of Soundness.

We also note that the plan explains that it is unable to accommodate all of the new development, leading to the release of land at other sites, including Wisley (para 4.1.8). This clearly indicates that this proposed location is not sustainable, a point that we have raised previously in our objections to the recent planning applications.
The RSPB’s concerns with the site

We highlight here the key concerns which we raised on the recently rejected planning application for the former Wisley airfield, that we consider are central to the inclusion of the site as an allocation in the Local Plan. We focus on concerns we raised about the general suitability of the site, as we consider that these are so fundamental to the site that they cannot be resolved by the promotion of an alternative development scheme on the site.

The RSPB highlighted that

“the location of the SANG between the development and the SPA will actually draw people towards the SPA and would end up simply providing new residents with a route to the SPA. Clearly, this defeats the object of providing a SANG.”  
(RSPB objection letter, 25 March 2015)

We further stated:

Whilst we understand the developer’s desire to locate the SANG in the 400m zone as built development is highly unlikely to be permitted we consider that the constraints this has on its design is likely to introduce pinch-points and compromise the SANG’s effectiveness.”  
(RSPB objection letter, 25 March 2015)

Finally the RSPB stated:

“The RSPB’s view is that the existing PROW [Public Rights of Way] fundamentally and unavoidably compromise the functionality of the SANG as an avoidance measure.”  
(RSPB objection letter, 12 February 2016)

It is important to note that as a result of the multiple rights of way run right across the whole development site and into the SPA, providing ready access to the SPA to residents of any housing scheme that is constructed on this site, it is our view that no housing allocation is appropriate in this location.

The Habitats Regulations Assessment

It is important to note the caveats associated with the evaluation of this particular allocation that the HRA uses to make its inclusion in the Plan appear acceptable. It states that bespoke SANGs “if provided to an appropriate standard and in a timely manner will provide a suitable avoidance measure” (p39). There are two key issues here: firstly whether, as highlighted above, it will be possible to provide a SANG of an appropriate standard, given the physical constraints of the site (long and narrow), and the presence of the multiple public rights of way. Secondly, it will be essential that this bespoke SANG is ready for the first residents to move in and that the ongoing development does not affect the tranquillity of the scheme. The designs promoted for the recently refused planning application do not offer confidence on either front. We disagree with the conclusion of the Plan HRA that it will be possible for the Council and Natural England to be content with the SANG provided on site (p39), for the reasons we highlighted in our section above considering our concerns with the site.

The HRA acknowledges that part of the site is located within the 400m zone of the Thames Basin Heaths Special Protection Area and that it would be this part of the site which would provide the SANG for the development and notes that a subsequent application level assessment will be required (para 7.3.9). The RSPB respectfully disagrees with the assertion of the HRA authors that

“It is not the purpose of this HRA to determine the deliverability and suitability of the SANG identified above in line with Natural England’s SANG Criteria, merely to determine if the identified SANG provides suitable capacity to support the quantum and location of housing planned within the Plan.”  
(para 9.3.5)

As set out above in relation to our concerns about the recently rejected scheme, we do not consider it likely that a project level assessment will be able to adequately exclude the risk of harm to the Special Protection Area, as we do not believe a SANG at this development site can be effective in drawing residents away from the SPA as a result of the Public rights of way network on the site. As this information is already known and was available to the authors of the HRA we consider it inappropriate to rely upon such an approach here – the issues of concern are ones which are not capable of being resolved at the application level. Part of the role of the HRA of the Plan should be to evaluate the likelihood that a project-level assessment can be passed – helping to give a clear understanding of the likely deliverability of key sites: the former Wisley
airfield is expected to deliver 14.4% of the Borough’s overall housing until 2033 – so it is essential that any risks to such a site coming forward should be clearly evaluated.

What changes do you suggest should be made to the document?

Policy A35, and associated references to it should be deleted.

If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination? Yes

Why do you wish to participate at the Examination?

The issues surrounding this proposed allocation are of sufficient complexity that it is necessary to be able to address comments provided by other parties and engage in discussions at the Examination hearings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18728  Respondent: 15579457 / RSPB South East Office (Heather Richards)  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 which section of the plan (paragraph/policy/map/table) does this comment relate?

Policy I1: Infrastructure and delivery

Do you consider this section of the plan is legally compliant? Yes

Do you consider this section of the plan is sound? Yes

Do you consider this section of the document complies with the Duty to cooperate? Yes

RSPB Comment:

The RSPB welcomes the clear commitment within the policy to prioritise CIL expenditure on the delivery of mitigation and avoidance measures for the Thames Basin Heaths SPA. Since the introduction of CIL the former clear link between individual developments and the provision of SANG along with the “ring fencing” that was provided by the section 106 mechanism has been lost. This statement should help to provide legal certainty as to the delivery of this mitigation measure that is required by the Conservation of Habitats and Species Regulations 2010 (as amended). However, the RSPB notes that whilst the legal obligation is clearly stated, the Plan does not currently make clear the long-term benefits that pursuing this policy will have for the Borough.

What changes do you suggest should be made to the document?

To address the concern we highlighted above, the RSPB recommends the provision of some additional text which explains clearly what SANG are, and explaining why it is being prioritised over other infrastructure. It would be particularly beneficial to highlight what proportion of the “over 250ha” of new accessible public open space across the borough
If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination? No.

Why do you wish to participate at the Examination?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18729  Respondent: 15579457 / RSPB South East Office (Heather Richards)  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): ()

To which section of the plan (paragraph/policy/map/table) does this comment relate?

Policy I4: Green and blue infrastructure

Do you consider this section of the plan is legally compliant? Yes

Do you consider this section of the plan is sound? Yes

Do you consider this section of the document complies with the Duty to cooperate? Yes

RSPB Comment:

The RSPB welcomes the inclusion of policy I4. In particular we welcome the stated intention that the current and potential biodiversity of land outside Biodiversity Opportunity Areas (BOAs) will be considered. We also welcome the commitment to produce a Green and Blue Infrastructure Supplementary Planning Document. (para 4.6.35)

There appears to be a cross-referencing error in para 4.6.37, which refers to policy “I5”, but no such policy exists. Should this be a reference to policy P5 instead?

The RSPB welcomes the proposal that open space, including SANGs within or adjacent to the BOAs will be designed and managed to support the aims of the BOA. However, it will be important to ensure that SANGs’ primary role as mitigation is not compromised by this work. The RSPB considers that in general increasing the biodiversity of a SANG is likely to increase its attractiveness to the public, but it is important that if there is any potential conflict between mitigation and biodiversity enhancement this should be resolved in favour of the mitigation role. In addition it is essential that sites that are already important for wildlife are not selected as SANGs due to the immediate conflict between conservation and recreation.

What changes do you suggest should be made to the document?

Correct the apparent cross-referencing error highlighted above.
Add a sentence making it clear that the mitigation function of SANG will be prioritised where there is a potential conflict with biodiversity enhancement measures.

*If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination?* No.

Why do you wish to participate at the Examination?

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>PSLPP16/18727</th>
<th>Respondent:</th>
<th>15579457 / RSPB South East Office (Heather Richards)</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of 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 which section of the plan (paragraph/policy/map/table) does this comment relate?

Policy P5: Thames Basin Heath Special Protection Area

Do you consider this section of the plan is legally compliant? Yes

Do you consider this section of the plan is sound? Yes

Do you consider this section of the document complies with the Duty to cooperate? Yes

RSPB Comment:

The RSPB welcomes the detailed policy to protect the Special Protection Area.

What changes do you suggest should be made to the document?

The RSPB does not recommend any changes should be made.

*If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination?* Yes.

Why do you wish to participate at the Examination?

The RSPB has been involved in the formulation and subsequent delivery of the Thames Basin Heaths Special Protection Area Delivery Framework, whose objectives are delivered through policy P5. The RSPB is keen to be involved in any discussion about this policy at the Examination in order to support the approach that the Council have taken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** SQLP16/1426  **Respondent:** 15579457 / RSPB South East Office (Heather Richards)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

No. The RSPB does not consider that the document is legally compliant. The plan can only be adopted if the Council is able, on the basis of all the evidence available, to conclude that the Plan will avoid an adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (or any other Special Protection Area (SPA) or Special Area of Conservation(SAC)), as required by The Conservation of Habitats and Species Regulations 2010 (as amended).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** SQLP16/1427  **Respondent:** 15579457 / RSPB South East Office (Heather Richards)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

No. The RSPB considers that the proposed submission local plan is not sound. We consider that there are problems with 3 of the tests of soundness. We do not consider that the plan is justified, in particular we do not consider that the inclusion of Wisley Airfield as a new settlement represents the most appropriate strategy when considered against reasonable alternatives. We do not consider that the Wisley Airfield aspect of the plan is deliverable, particularly as a scheme very similar to that proposed in the Plan has recently been refused by the Council on a number of grounds which are unlikely to resolvable, and that consequently the plan is not effective: in particular, the reliance upon this particular site to provide 14.4% of the Borough’s 2033 housing figure places the delivery of the overall housing target at risk. We also note that national policy (in particular paragraphs 117 to 119 of the National Planning Policy Framework) highlight the importance of ensuring effective protection of internationally important wildlife sites through the local plan process but consider that the inclusion of the Wisley Airfield proposal runs counter to that policy direction, meaning that the plan is not consistent with national policy. We expand on these points in our comments on Policy A35: Land at former Wisley airfield, Ockham below.

In order to make the plan sound the proposed Wisley Airfield site allocation (and its associated references) needs to be removed from the plan. This will make the plan consistent with national policy by respecting the policy and legislative
safeguards accorded to the Thames Basin Heaths Special Protection Area, remove uncertainties about the delivery of a large proportion of the housing, and remove an inappropriate settlement proposal from 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:** SQLP16/1428  **Respondent:** 15579457 / RSPB South East Office (Heather Richards)  **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)

Yes. The RSPB wishes to appear at the Examination. The issues we raise are of a highly specialist nature and will benefit from the ability to comment directly on them and respond to other parties at the relevant examination sessions. We set out our reasons in greater detail in our comments on policies P5 and A35 below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1429  **Respondent:** 15579457 / RSPB South East Office (Heather Richards)  **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):** ()

**Housing figures**

The RSPB is using this question to highlight points that we have observed in our reading of the documents, but do not wish to raise formal objections to.

There appear to be inconsistencies in the presentation of housing numbers throughout the document. The Spatial Vision (p19) and Strategic Policy S2 “Borough Wide Strategy” both refer to the delivery of “13,860 additional houses by 2033”. In para 4.1.12 under policy S2, the text states “Table 1 shows a number of new homes that is greater than the figure in the policy”, but in fact the total in the table adds up to only 13,652, a figure 208 short of that specified in the policy. In addition, the detailed sites Table set out at pages 123-126 adds up to only 12,698 (1,162 short of the Strategic figure), even though it includes a windfall allowance of 625 houses over years 1-15 of the Plan. It is not clear why the figures are different.
Given the importance of this issue to the overall plan we request that the Council provides a brief statement clarifying where amendments to the documentation need to be made to ensure consistency. Alternatively a clear statement needs to be made to explain why the figures provided in the document are different.

**Monitoring indicators**

The RSPB notes the proposal to rely upon the “Amount of new SANG provided or funded” as a monitoring indicator, but considers that the sole proposed data source “Planning applications” does not provide sufficient detail to ensure that the mitigation is being delivered in a suitable manner. For the SANG regime to operate effectively it is essential that new SANG is delivered close to the new houses that are being built, and before the new houses are completed, so that they can influence the recreation habits of new residents. It is also essential that the quantum of SANG delivery matches (or exceeds) the rate of construction of houses – the mitigation cannot be considered to be properly delivered if there is a shortfall in its supply at any point.

As highlighted in the previous paragraph, a key element of the mitigation package is ensuring that mitigation is being delivered near to the new houses that are being built. The planning application information shows where houses are being consented, but it does not indicate where they are actually being delivered. The Council will need to select an alternative indicator to provide this information, but as it is responsible for administering all SANG funds gathered through section 106 agreements and through future CIL receipts it should be possible for it to use information about the income from developers and the expenditure from these funding sources to ensure that the appropriate amount of SANG is being delivered in the right locations at the right time.

**Habitats Regulations Assessment for the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (June 2016)**

In Box 1 (page 6), the reference to regulation 61(1) of the Conservation of Habitats and Species Regulations 2010 (as amended) should be changed to regulation 102(1) of the same regulations, which specifically covers the assessment of Local Plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2902  **Respondent:** 15579489 / Ben Palmer  **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.

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: PSLPS16/5962  Respondent: 15579489 / Ben Palmer  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.

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.

Again the infrastructure required does not seem to have been address in the plan.

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.

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:
Do you consider this section of the document; 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.

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: PSLPP16/12085  Respondent: 15579489 / Ben Palmer  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 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become a hugely 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 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: PSLPP16/12087  Respondent: 15579489 / Ben Palmer  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.

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: PSLPP16/12084  Respondent: 15579489 / Ben Palmer  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies 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.

The whole point of “Green Belt” is to provide a buffer from the continual pressure of urbanisation. We must protect these areas for the future, they were created for a reason and that principle is need now more than ever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/12083  Respondent: 15579489 / Ben Palmer  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 development of thousands of homes in the villages to the north of Guildford 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.

Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable infrastructure 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): ()

Please preserve our Cathedral in its unique setting – green spaces are disappearing everywhere in the Borough – let’s keep this one, it’s the most important urban lung Guildford’s still got!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The borough’s aim to meet its housing need as set out in the West Surrey Strategic Housing Market Assessment (SHMA) is welcomed. As this is an important policy principle the borough may wish to consider whether meeting need should be set out more explicitly in the Plan in the context of both the annual need and the planned provision figures. Consideration of long term migration patterns alongside the shorter term 2012-based Subnational Population Projections (SNPP) in the SHMA is welcomed - strategically, both can usefully underpin household projections when assessing housing need. From a strategic transport perspective, Crossrail 2 would release capacity on rail corridors that are used by trains to/from Guildford and thereby help to support future development within the borough, although Crossrail 2 would not directly serve any stations within Guildford. Explicit support for Crossrail 2 and a recognition of its important contribution to delivering future growth as set out in the Local Plan would be welcomed.

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): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We are objecting to the proposed Normandy Development plans. We outline our concerns over the proposed developments at Normandy and Flexford. Our concerns are:

1. Flooding at Little Flexford, earmarked for a proposed development of 50 properties (including flats) will increase and will be detrimental to the current local properties’. Dropping 1100 homes in this rural area is a recipe for chaos for roads along with the extra amenities’ to cope with such an influx of dwellings on plains that flood in heavy downpours.

Surely its more appropriate to build more homes around Guildford with close ties to Guildford rather than dumping families in one area where they will be forced to travel back and forth on already gridlocked roads which barely cope with the amount of traffic flow we currently experience.

1. 7 temporary pitches already at Palm Nurseries, 2 traveller sites (one of which is already for entertaining travellers) at Cobbetts Hill Road and Whittles Drive.
2. Grade 3 arable and pastoral land, in the last 6 years 2000 square kilometres of such land has been lost to developments at the loss of local farmers’ income.
3. Increase in light pollution next to ancient woodland and visible from Surrey Hills AONB.
4. A large number of homes will be boxed in by a single lane railway bridge, at the junctions of A323 at Glaziers Lane and Westwood Lane. Thus also compounding the traffic congestion in the surrounding road and communities and increasing the number of traffic accidents. Our local roads and “A” roads are grinding to a halt at peak times with massively increased exhaust pollution of NoX and CO2, this will increase even further if the proposed homes and a huge secondary school (with daily drop offs and pick ups) if developed. NoX and CO2 are dangerous to the elderly and children who live here already.
5. The proposal of building a 1500 pupil secondary school in Normandy is beyond belief when King’s College at Park Barn and Ash Manor are undersubscribed. St Peter’s at Chertsey and Guildford County School are planning to be expanding in the near future. There is no legal evidence to back up Cllr Spooner’s comment that a hospital or school “trumps” greenbelt planning policy nor does it provide “exceptional circumstance” to remove Normandy’s Green Belt from the Metropolitan Green Belt. There is no need for a further secondary school.
6. Ignoring past verdicts of previous planning inspectors regarding green fields’ contribution to the “openness” of the Green Belt.
7. The proposal submitted to GBC on behalf of Taylor Wimpey does not objectively assess the true needs of Normandy’s residents.
8. We understand that developers are hoarding brown field sites which can provide 650,000 homes and there are further brown field sites available for another million homes. Building on Green Belt land in Normandy and Flexford will be overdevelopment and wreck our green fields. Brownfield sites means regeneration rather than building on open fields which is destructive and disastrous to our environment.
9. Use should be made of redundant, energy hungry offices in Guildford, by turning them into much needed housing.
10. Breaking of election promises was highlighted and reprinted in The Times on 25th April 2016, “We will always protect the Green Belt and make sure planning decisions are made by local people.” The green belt will not be protected if the developments at Normandy and Flexford go ahead.
11. Overdevelopment here in Normandy and Flexford will be a tremendous strain on an already overworked and stretched GP practice here at Glaziers Lane and Fairlands – we already have to wait over 3 weeks to see a GP for 7 minutes or less.
12. The Council do not appear to have any balanced plan as to how to build extra housing in a thoughtful and sensitive way.
13. The irony of this all, it took over 2 years for GBC planning department and the Millers at Little Flexford to agree on the demolition and rebuild of a property that was of suitable size and height that is sympathetic to the Green Belt. GBC have earmarked two flood ridden paddocks at Little Flexford for developing 50 homes. This is the icing on the cake.
**Comment ID:** PSLPA16/2906  **Respondent:** 15579649 / Peter E May  **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): ()**

17. 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:** PSLPA16/2907  **Respondent:** 15579649 / Peter E May  **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): ()**

18. 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: PSLPS16/5972  Respondent: 15579649 / Peter E May  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): ()

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 brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/5973</th>
<th>Respondent: 15579649 / Peter E May</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): ()

16. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/12108</th>
<th>Respondent: 15579649 / Peter E May</th>
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### 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 to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>PSLPP16/12104</th>
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### 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. 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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<th>Comment ID:</th>
<th>PSLPP16/12106</th>
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<p>| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 |</p>
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<th>Comment ID: PSLPP16/12107  Respondent: 15579649 / Peter E May  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>6.  I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)</td>
<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>
</tr>
<tr>
<td>There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.</td>
<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>Comment ID: PSLPP16/12117  Respondent: 15579649 / Peter E May  Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</th>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>7.  I OBJECT to the loss of rural employment (Policy E5)</td>
<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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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
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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/“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: PSLPP16/12112  Respondent: 15579649 / Peter E May  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 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.

14. 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.

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:
Do you consider this section of 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 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.

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.
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: PSLPP16/12110  Respondent: 15579649 / Peter E May  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 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: PSLPP16/12111  Respondent: 15579649 / Peter E May  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)

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)

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:
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.

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: PSLPP16/12095</th>
<th>Respondent: 15579649 / Peter E May</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Objections to Guildford Borough Proposed Submission Local Plan (June 2016)</td>
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<tr>
<td>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.</td>
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<tr>
<td>I set out below my objection to specific policies and matters within the Plan.</td>
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<tr>
<td>1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)</td>
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<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
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<tr>
<td>The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.</td>
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<tr>
<td>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...</td>
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</table>
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: PSLPP16/12097  Respondent: 15579649 / Peter E May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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)
   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:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/5970</th>
<th>Respondent:</th>
<th>15579713 / Barbara Hackman</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 wish to object very strongly to the proposed development at Gosden Hill Farm in the Draft Local Plan. I believe insufficient consideration has been given to transport issues.

- Without a 4 way junction onto the A3 to the north of Burpham all traffic from the new site wishing to travel north will have to use London Road and Clay Lane resulting in a large increase of local traffic.
- Improvements to the A3 are not scheduled in the draft plan until some years after the development of housing on the proposed site.
- Traffic from the proposed site wishing to travel to Guildford will cause additional pressure on the narrow London Road and especially the London Road/New Inn Lane roundabout inundating Burpham with additional traffic. Burpham’s road network is currently under considerable pressure at certain times of the day.
- There are still problems regarding surface water drainage in parts of Burpham and a large development will cause further problems.
- Such a large development on the edges of Burpham, West Clandon and Merrow is out of keeping with the village atmosphere of the three parishes.

For these reasons I very strongly object to such a large development at Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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</table>
I wish to object very strongly to the inclusion of the development of Gosden Hill Farm in the Draft Local Plan. I believe insufficient consideration is being given to the infrastructure required for such a development.

1. a) Without a 4 way junction onto the A3 to the north of Burpham all traffic from the new site wishing to travel north will have to use London Road and Clay Lane resulting in a large increase of local traffic.
2. b) Improvements to the A3 are not scheduled in the draft plan until some years after the development of housing on the proposed site.
3. c) Traffic from the proposed site wishing to travel to Guildford will cause additional pressure on the narrow London Road and especially the London Road/New Inn Lane roundabout inundating Burpham with additional traffic. Burpham’s road network is currently under considerable pressure at certain times of the day.
4. d) Such a large development on the edges of Burpham, West Clandon and Merrow is out of keeping with the village atmosphere of the three parishes.

For these reasons I very strongly object to such a large development at Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/5971</th>
<th>Respondent: 15579777 / Sandra Neale</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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I object to the proposal of this site. It is unjustified and will destroy our rural environment. 100% increase in the number of homes will destroy Guildford boroughs greatest asset, the rural countryside. The idea of a school apart from housing is not needed at all. Secondary schools to the west of the borough are undersubscribed by 736.

Also I object because this unrealistic growth will force more traffic onto busy A roads and minor roads, causing more exhaust pollution, threatening the elderly and children.

GBCs Local Plan is against the wishes of local residents.

I STRONGLY OBJECT TO THIS PROPOSED PLAN

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/5975</th>
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<tr>
<td>Decision needed on a tunnel before Gosden Hill can be embarked for development – Surely there needs to be a plan in place to combat the severe traffic congestion already affecting the wider area of Guildford before any extra housing plans can be approved</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Lack of specific details of essential infrastructure, especially as there is an acknowledged existing deficit – How will all this be funded?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Loss of Green Belt – Once Green Belt areas have been lost they can never be recovered. Why haven’t Brown Fill sites been considered first?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12114   Respondent: 15579809 / Julie Pilkington   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 one area of the borough - When the area of Burpham is already experiencing severe traffic problems and strained amenities for local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12118   Respondent: 15579809 / Julie Pilkington   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12124   Respondent: 15579937 / Mike Chard   Agent:
Document: Proposed Submission Local Plan: strategy 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 removal of the horsleys from the green belt and I feel exceptional circumstances have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12125  Respondent: 15579937 / Mike Chard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 inflated number of new houses in the plan even with better infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12127  Respondent: 15579969 / Candice Carrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are some outlines provided about the additional buildings that wish to be placed on certain sites. However, there are no details about the development of the infrastructure that will be needed to stop these developments from just causing further congestion and decreasing the quality of life for all those same people that would come to live here. Also, these plans have not been very well publicised by the council to be aware of what has been proposed. For these key reasons, I object to this Draft local plan.

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 proposed on the Guildford Borough Council. Although the videos and documents state that the plan is aimed at providing affordable housing to accommodate local workers and attract more talent to the area, there is insufficient detail provided as to how the infrastructure will be upgraded to cope with this increase.

It hardly needs to be said that traffic in Guildford and the surrounding roads, especially the A3, is cripplingly high. There are frequent accidents, some fatal, and even without an accident the high amount of traffic makes the commute very frustrating. The impact of going through this daily commute is very taxing on the well-being of people living in these parts. More homes in these areas increases the numbers of people, but the plan provides no details or suggestions such as widening of roads, provision of subsidised transport for locals or anything that will really reduce congestion on the roads and improve efficiency and personal well-being.

In addition, the impact on leisure such as walking and cycling is very, very dangerous. This area is very close to the popular South Downs and has lovely Areas of Outstanding Natural Beauty, but it is difficult to enjoy them safely as there are more and more large vehicles on the regular roads and taking to the back lanes to avoid traffic. This causes a conflict with those indulging in walking and cycling to enjoy the natural beauty. In fact, I personally know of a couple of people who have been knocked off their bicycles by close proximity to motorised vehicles. Your plan does not provide any clear information as to how this will be improved. There are general statements made about needing to accommodate other forms of transport, but there are no practical details given that will make these pursuits safer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

In addition, there has been very little information provided to the residents from the Local Council and we had to be alerted to the information on the website by community members. There has therefore, not really been a reasonable chance for locals to know about this consultation period which seems not very open and within the spirit for such a large decision. It seems more reasonable that the Council could have distributed some leaflets to ensure that those affected would be given a fair chance to read and digest the plans for such an important proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
### Comment ID: PSLPA16/2913  Respondent: 15580065 / Deniz Kucukreisoglu  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):** ()

It is extremely troubling and scandalous that no information on how the numbers development proposals, of properties were derived or calculated. It is not acceptable that the public or members of the council can be kept in the dark about all of the details of the Strategic Housing Market Assessment (SHMA). It is unacceptable that a property development consultant’s mathematical model, its parameters, and input values are not made public knowledge despite the fact that it is us who is most impacted by those ‘calculations’. Given that the details have not been revealed or communicated to us as far as I know, it is not unreasonable by residents of the local community, to consider the possibility of vested commercial interests and/or a conflicts of interest not to reveal all details of the model and associated data. As if that was not enough, I understand that the SHMA numbers are to be further increased by Guildford Borough Council. It will surely result in even more unsustainable damage to our community, wellbeing and wildlife habitats as well as the greater tragedy of further destroying our precious greenbelt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPA16/2912  Respondent: 15580065 / Deniz Kucukreisoglu  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 you to express my concern about the proposed development plans for and the (over) development of the Horsleys, and surrounding areas.

1. I strongly object to the proposal to remove the Horsleys from the Green belt. The reason I chose to live here is precisely the fact that it is a green belt area and nature reserve for local wildlife. I do not believe that there are any circumstances requiring to reduce the greenbelt area, and no sensible rationale/reason has been demonstrated to warrant proceeding with such a proposal.
2. The defined land boundaries for existing settlement areas should not be increased. We should not consider the creation of any new settlement areas for any kind of developments within the greenbelt or village boundaries.

3. Our infrastructure is already overloaded. We have had multiple electricity supply failures over the years. It can be difficulty to park in the villages for local shopping, even during non-busy periods. Our medical centre is already operating beyond its capacity. The drainage is also a problem and even in my own home, inadequate at times. Adding further housing or developments to our infrastructure may likely completely overwhelm it.

I understand that there are proposals to designate Station Parade as a ‘District Centre’. This is not appropriate and is a fundamental misunderstanding of what the nature of the facilities in the village centre are. This may open up the area to urban development in the future. I do not agree with and I oppose the designation of Station parade 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: PSLPS16/5979  Respondent: 15580065 / Deniz Kucukreisoglu  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am also opposed to the development proposals for Burnt Common, Gosden Hill farm and Burpham. As those areas will also incur irreparable damage to their fabric and sustainable wellbeing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5978  Respondent: 15580065 / Deniz Kucukreisoglu  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 proposed development of further large scale housing, retail, commercial, traveller and schools on the former Wisley Airfield site is ill judged and wholly inappropriate. The impact of a sudden addition and development of over 2000 properties on the Wisley Airfield site would be enormous on the surrounding villages, which have gradually developed in a sustainable manner over a very long period of time. This is now under threat and such development proposals will ruin and change the nature of our community beyond repair forever. I am opposed to these development proposals in any shape for form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In summary I am extremely disappointed that such a ghastly proposal is being considered and I am very strongly opposed to any consideration of further developments or reduction in green spaces in and around our beautiful villages and surrounding areas. Given the severe impact that this proposal will have on me and the quality of my living in my community, the outcome of this proposal will weigh very heavily on me.

I appeal and urge you to reject these development proposals to save, retain and maintain our irreplaceable communities and beautiful greenbelt for us and future generations.

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 “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 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 III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6011   Respondent: 15581665 / Laura 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
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highechts 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 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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<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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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:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPP16/12214</th>
<th>Respondent:</th>
<th>15581665 / Laura Daboo</th>
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<tbody>
<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: PSLPP16/12254  Respondent: 15581665 / Laura 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: PSLPP16/12258  Respondent: 15581665 / Laura 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:

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Comment ID: PSLPP16/12201  Respondent: 15581665 / Laura 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12205  Respondent: 15581665 / Laura Daboo  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: PSLPP16/12209  Respondent: 15581665 / Laura 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: PSLPP16/12273  Respondent: 15581665 / Laura Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that, whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or 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: PSLPP16/12242  Respondent: 15581665 / Laura 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:** PSLPP16/12246  **Respondent:** 15581665 / Laura Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / 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:** PSLPP16/12266  **Respondent:** 15581665 / Laura 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 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 though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being ”closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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 I 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 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, 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:

Comment ID: PSLPP16/12227  Respondent: 15581665 / Laura Daboo  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. 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:**

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<th>Respondent: 15581665 / Laura 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 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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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires...
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12197  Respondent: 15581665 / Laura Daboo  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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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.

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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 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 unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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<th>Respondent:</th>
<th>15581665 / Laura Daboo</th>
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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:**

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**Comment ID:** PSLPP16/12187  **Respondent:** 15581665 / Laura Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with 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”.

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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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<tr>
<th>Comment ID: SQLP16/1441</th>
<th>Respondent: 15581665 / Laura Daboo</th>
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<tr>
<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): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set.

   Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<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?

Attached documents:

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**Comment ID:** SQLP16/1449  **Respondent:** 15581665 / Laura Daboo  **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): ()

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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 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:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/2947  Respondent: 15581761 / Peter 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): ()

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:  PSLPA16/2939  Respondent: 15581761 / Peter Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6013  Respondent: 15581761 / Peter 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 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 Higheotts 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 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:
Do you consider this section of the document; complies with 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: PSLPP16/12217  Respondent: 15581761 / Peter 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:

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**Comment ID:** PSLP16/12256  **Respondent:** 15581761 / Peter 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): ()

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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:** PSLP16/12261  **Respondent:** 15581761 / Peter Lee  **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

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.
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:
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: PSLPP16/12211  Respondent: 15581761 / Peter Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12276  Respondent: 15581761 / Peter Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that, whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12252</th>
<th>Respondent: 15581761 / Peter Lee</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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</table>
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: PSLPP16/12244  Respondent: 15581761 / Peter 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 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: PSLPP16/12248  Respondent: 15581761 / Peter Lee  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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: PSLPP16/12270  Respondent: 15581761 / Peter Lee  Agent:
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 though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/12223  **Respondent:** 15581761 / Peter 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):** ()

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 I 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 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

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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?

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:

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I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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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.

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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:** PSLPP16/12199  **Respondent:** 15581761 / Peter Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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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:**
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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12190</th>
<th>Respondent: 15581761 / Peter Lee</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> 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 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: SQLP16/1443  Respondent: 15581761 / Peter Lee  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: SQLP16/1447  Respondent: 15581761 / Peter Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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: SQLP16/1451  Respondent: 15581761 / Peter Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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: SQLP16/1455  Respondent: 15581761 / Peter Lee  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:
In the absence of detailed infrastructure proposals, the Council has failed to demonstrate that policy A25 is genuinely capable of meeting the Borough’s development needs in the plan period.

It is unreasonable to make proposals conditional upon as yet unknown infrastructure solutions and expect residents to speculate on whether or not those solutions will be acceptable to them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5994  Respondent: 15581825 / Lesley Pink  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): ()

REASONS WHY I OBJECT STRONGLY TO THE PROPOSED A43 GARLICK’S ARCH SITE

I OBJECT TO Send Village being removed from the Green Belt.

I OBJECT TO. all erosion of the Green Belt

I OBJECT TO the A43a on off ramp at Clandon

THE A3 CAN’T COPE WITH THE TRAFFIC !!!!!!!!

SEND ROAD WILL BECOME EVEN MORE OVERLOADED

CHAOS ON OUR LOCAL ROADS

I OBJECT TO the disproportionate amount of development in one area of the Borough

400 HOUSES AND 7000sq METRES OF INDUSTRIAL SPACE AT GARRICKS LANE

40 HOUSES AND TWO TRAVELLERS PITCHES AT SEND HILL

45 HOUSES AT CLOCKBARN NURSERY

WISLEY SITE 2000 HOMES STILL IN THE LOCAL PLAN

GOSDEN HILL 2,200 HOMES

I OBJECT TO the limited consultation period
VERY SNEAKY LAST MINUTE INCLUSION OF NEW SITES (LESS THAN 2 WEEKS )

I OBJECT TO the lack of Doctors Surgeries to cope with increased residents

HOW WILL THE ROYAL SURREY COPE WITH THOUSANDS MORE PATIENTS

WHERE WILL THEY PARK ?????

THATS IF THEY EVEN ARRIVE IN TIME FOR THEIR APPOINTMENT DUE TO SUCH CONGESTION AROUND THE CATHEDRAL EXIT ON THE A3

I OBJECT TO lack of schools to cope with more residents.

WHERE IS THE SPACE !!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I have lived in Normandy for 11 years. Before that I lived in Worplesdon for 45 years and was a partner in the Fairlands medical practice. The practice area included Normandy (and beyond) and I was therefore very familiar with the village long before I moved here. A few years before I retired I was the lead partner in building the branch surgery and pharmacy in Glaziers Lane.

I object very strongly to the draft plan and make the following comments.

1. There seems to be no evidence whatever for the need for a new secondary school, here or elsewhere to the west of Guildford. From what I have read and heard the existing schools are not at all full and are capable of expansion if need be. Therefore if the school is not needed there can be no case for building all (or indeed any) of the houses which will at least double the population of the village and change its character for ever. Although it is obviously easier for GBC to deal with a few large-scale developers in order to build the target number of new houses, thereby destroying large areas of green belt, there has to be a way of allowing small local developments in Normandy and elsewhere.

1. I am confused as to the linking of Normandy and Flexford as if they are two separate places. This may suit planning ideas but in reality they both make up Normandy. I have never met a patient or anyone else who tells me that they live in Flexford. To add to the confusion Wanborough station is in the Flexford end of Normandy and was renamed in the late 19th century at the request of Mr Gladstone who lived for while in Wanborough Manor and his many political visitors were confused by its original name.
1. If this development were to take place the increase in traffic would be horrendous, not least the construction traffic over at least several years. The proposed site is bounded on the N by the A323 from which there would be no access without the demolition of a house, or several. On the E there is Glaziers Lane, a D road, from which there could be some access, and on the W, Westwood Lane, a C road with space for access. Both have significant hazards to traffic which would be very expensive to improve. The hump railway bridge in Glaziers Lane is narrow, two cars can just about pass each other, but nothing bigger. Westwood Lane has a bridge under the railway which is narrower still with a chicane and traffic is “managed” by priority arrows which are often ignored or misunderstood. (I write from regular experience). But no-one has been killed recently so it probably won't change. The height restriction excludes tall lorries and double-decker buses.

1. When permission was given recently for 16 units just off Westwood Lane there were serious concerns about the adequacy of the drains and there were accounts of houses nearby with sewage overflowing into their property after heavy rain. It seems probable that massive expenditure on the drainage system may be needed to service a large new development. I'm sure that members of the local Flood Forum will offer informed comment on this.

1. I am aware of serious environmental and legal issues and am content to leave these to experts for comment.

1. I note that a pub is included in the proposed amenities together with shops. The developer ought to be aware that there used to be two pubs in Normandy and three very nearby in Ash. One in Ash survives.

1. I am not aware that any consideration has been given to the medical care of the 3000+ extra population. The building in Glaziers Lane which my practice built would need considerable enlargement (intruding the car park) and the co-operation of GBC’s planners to do this. Or maybe relocation to the new development with easy access for all the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re. Guildford Local Plan, as a resident of East Horsley, I wish to comment as follows:

1. The "exceptional circumstances" required to remove the Horsleys from the Green Belt which are integral to the fulfilment of this plan do not exist as stated in the plan.

2. The proposal to extend the boundaries of the Settlement areas of the Horsleys appears to be aimed at opening the way for even greater development in the future than that currently proposed.

3. Our local infrastructure is already overloaded. Schools, medical facilities, station car parks and local roads are overstretched, over full, or becoming congested. With regard to local roads, some, like Ockham Road and East Lane, are used more and more as "rat runs" by people who do not live locally. The proposed increase in households by over 2000 in this small area will make for enormous difficulties with regard to all of the above. For example, the very real minimum of 4000 extra vehicles using our local roads is the stuff of nightmares.

4. The proposal to designate Station Parade as a "District Centre" makes it obvious that the long term aim is to completely destroy the villages as such and to create a new urban environment. The wonderful community spirit of the Horsleys as exemplified by organisations such as the West Horsley Wheel of Care - a recent recipient of the Queens Award for Voluntary Service - East Horsley Care, The Good Companions and many others, will be lost amid a rush to build more and more large family homes for London commuters or to be sold to overseas investors who will never live here. The Horsleys and neighbouring Ockham will become, in effect, an extension of Greater London, very close to Guildford! is that what Guildford Borough Council wants?

5. The housing numbers proposed are preposterously high, calculated to produce a 35% increase in households in West Horsley alone.

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 that 15 villages are threatened. GBC seems intent on the destruction of villages and the creation of suburbs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12259  Respondent: 15582017 / Valerie Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of green belt included in every case in the local draft plan despite election pledges by both government and local councillors. GBC has not made enough effort to utilise brownfield sites. Developers must be queuing up to use the green belt sites they have been buying up. In the newspaper yesterday an article reads ‘Mrs May has already referenced the “need to do far more to get more houses build” and arrest the decline of home ownership, but she has also ruled out any changes to the green belt.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12262  Respondent: 15582017 / Valerie Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that GBC is creating towns at Wisley and Burpham, 2000 houses at each site, and 1850 at Blackwell Farm. Far too high a density of traffic onto the A3 which is already gridlocked at certain times of the day.

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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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The development proposals at Gosden Hill Farm (Policy A25) are unacceptable. The plan does not demonstrate how this development can be accommodated within the current infrastructure. There is an absence of detailed infrastructure proposals. There is reference to a new southbound on slip road to the A3 but this would lead to significant traffic congestion for Burpham and there is no indication of any detailed infrastructure proposals associated with this. Furthermore, all the necessary infrastructure should be undertaken in advance of any development proposals but it is not reasonable to make proposals conditional upon as yet unknown infrastructure proposals.

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>PSLPS16/6019</th>
<th>Respondent:</th>
<th>15582145 / Robert C Jones</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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I am sure you (councillors, developers and investors) are all aware of the many, many objections to this plan. My objection is simple, the drainage for rain water run off from this proposed elevated developed site has not been thought through.

To me it is plainly obvious that if there is any weather 'event' resulting in above normal rainfall (even normal rainfall often causes problems) the adjacent Wisley Lake (or Bolder Mere) will flood resulting in a flooded A3 and probably the M25 not to mention the nearby River Wey and Mole Valley which already floods regularly.

Any increase in concrete in this sensitive area will have dire consequences for all surrounding districts.

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>PSLPS16/6020</th>
<th>Respondent:</th>
<th>15582177 / Caroline Collins</th>
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<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</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 would like these objections to be seen by the planning Inspector.

My objection is based on the following: -

There is already sufficient housing proposed for the borough (18,860) so there is no need for this additional development.

This is a New site and was not included in the Regulation 18 draft and has not been consulted upon previously.

This is Green Belt land permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances here.

The site is a place of natural beauty and a natural conservation area which has existed since the 16th Century.

The proposed industrial development is not required (the latest Employment land Needs Assessment 2015 (ELNA) shows a reduction of 80% from the previous draft plan. Any industrial space should be located at the already industrialised site at Slyfield.

A new 4 way interchange onto the A3 would cause even more traffic problems to an already daily congested area. The surrounding roads are not suitable or sufficient to take even more traffic.

In short this is an unsuitable development that should not proceed. Whilst I appreciate we need to provide housing and industrial accommodation we must stop using Greenfield sites until we have exhausted all of the Brownfield options that exist in the borough, of which you will be well aware there are many. We must ensure that we manage land in the borough so that we leave future generations areas of natural beauty that they can enjoy and use.

Send Marsh was also known for flooding and to take away more trees and natural sources for the rain water is madness when other options are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is also a lack of any real evidence for the need for these massive housing developments. They will not significantly reduce the cost of local housing for local people because in the main they will attract people from outside of the area and our local people in need of housing won't be able to afford them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7377  Respondent: 15582337 / Peter 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 site A25 Gosden Hill Farm. This is a 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:

Comment ID: PSLPS16/7378  Respondent: 15582337 / Peter 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 site A35 Wisley Airfield. Yet another massive 2000 home development that is inappropriate and unsustainable and again in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7375  Respondent: 15582337 / Peter Hill  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 late inclusion of site A43 Garlicks Arch.

I object to site A43a the on and off ramp at Burnt Common / Clandon as this will make the traffic problems currently suffered by Ripley and Send far worse, attracting vehicles from a wide area into trying to access the A3 and M25. When there is an accident or breakdown on the A3 or M25 the villages and surrounding become grid locked, this proposal will cause this to happen even sooner.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7376  Respondent: 15582337 / Peter Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot. 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:

Comment ID: PSLPS16/6023  Respondent: 15582337 / Peter Hill  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 site a57 the paddocks - 4 traveller pitches

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to A57 The Paddocks- 4 traveller pitches.</td>
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<td>i object any removal of any villages from the green belt</td>
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<td>i object to all erosion of green belt</td>
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</table>
I object to any erosion of the Green Belt. It was put in place to prevent developments merging together and causing loss of identity of villages and settlements. These proposed developments will cause Burpham, Clandon, Send, Ripley, Wisley and Ockham to be merged into one massive housing estate with thousands of extra people and their vehicles clogging our roads, overwhelming our health services, schools and local amenities.

I object to any "in-setting" (i.e. removal) of any villages from the protection of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document:</td>
<td>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 disproportional 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: PSLPA16/2950  Respondent: 15582401 / Peter Mathers  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): ()

One final thought: in the wake of the 'Brexit' decision, surely the Local Plan will have to be revised or indeed rewritten because projected immigration/emigration and therefore population levels will change, requiring new estimated housing needs. We trust that this important question will be taken into account before any further decisions are made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6024  Respondent: 15582401 / Peter Mathers  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): ()

As residents of Ripley, my family and I have studied with interest the Local Plan and the wealth of carefully argued objections that you have received.

We cannot offer any points that have not already been covered; but would endorse the comments that have been made and would underline, once again, the strength of feeling amongst the local community against what is being proposed. We note in particular the lack of logic in retaining the proposed Wisley Airfield development in the Plan, in spite of the fact that Officers and Councillors comprehensively rejected that proposal.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/2952</th>
<th>Respondent:</th>
<th>15582465 / Grant Howieson</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 am a local resident of Send for 18 years now and I write to you to strongly object to the local planning proposals for my village. I cannot believe that many of them are even being considered as my local councillor's and even central government gave an election promise to protect the Green Belt which my village Send sits within.

There are a number of proposals that I strongly object to which will destroy the way of life that my family and I and other residents of Send currently have should any of these plans receive planning permission.

I strongly object to the proposed development of 40 houses and 2 travellers' pitches at Send Hill. This part of Send has very narrow single lane roads and therefore the road infrastructure is inadequate. The area also contains documented unsafe landfill waste which makes house building morally wrong (and illegal). It is also an area of countryside full of wildlife which is enjoyed by many local people and many walkers. I strongly object to its development proposal.

I also strongly object to the proposed 45 houses at Clockbarn Nursery. The volume of traffic that would have to use the junction of Tannery Lane and Send Road to access this site means that it is going to cause heavy additional traffic onto an already busy and dangerous junction and I do not believe that Tannery Lane could take any more traffic due to its narrowness.

I strongly object to the new interchange with the A3 at Burnt Common. The local roads cannot take the amount of traffic that this would generate through Send Village. It will cause gridlock on Send Road and Send Barns Lane which even now get gridlocked when a small set of road works are in place. I cannot imagine what the increase in traffic will have on the noise and pollution levels that local people will have to suffer should this happen. I strongly object to this development proposal.

I also strongly object to the building of 400 houses and 7000 square metres of industrial space at Garlick's arch. This site is covered by ancient woodland and on green belt land. It seems to me that Guildford Borough council have exaggerated there housing requirements whilst refusing to disclose their calculations to its borough residents, surely this wrong. There is an adequate site at Slyfield which could take the extra industrial site metres if it is actually needed at all. I strongly object to this development proposal.

Finally I would like to reiterate that my village Send cannot cope with any of the proposals that I have listed above. The local amenities and infrastructure are not up to it. Schools are full, the doctors surgery is full and roads are already at bursting point. To implement any of these proposals is not right in a designated GREEN BELT area and I strongly object to them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I have objections to the proposals in the Local Plan for the following reasons:

- **I object to Send village being removed from the Green Belt.** It is inappropriate to change the boundaries solely on the basis of enabling the development sites that are currently protected by being in the Green Belt. Brown field sites such as that at Slyfield are being discounted because of the time it would take to prepare the sites for building!

- **I object to the destruction of woodland at Garlick's Arch,** to allow for the building of 400 houses and 7,000 sq m of industrial space. This site is a NEW addition to the Local Plan and has not been consulted upon previously. It's inclusion is only because of the above mentioned issues to increase the size of the Slyfield site. There are no exceptional circumstances and the local facilities in Send and Ripley cannot take the extra people and the existing infrastructure cannot take the additional traffic. Many of the roads in these villages are lanes.

- **I object to additional slip roads to and from the A3 near Burntcommon,** this area is already congested at peak times of the day around the Burntcommon roundabout and the surrounding roads.

- **I object to the Send Hill development of 40 houses and traveller pitches,** this site is another NEW addition to the Local Plan. It has previously been landfill and contains documented unsafe landfill waste. Again the roads in this location are lanes and unsuitable to take more vehicles.

- **I object to the development of 2,000 homes at Gosden Hill Farm,** this site is very close to Send Village and the impact of traffic through the village would be substantial for vehicles not going north or south on the A3 but instead coming through the centre of Send. The building of the new junior school on the same site as the primary school will already increase pedestrians and traffic on Send barns lane and Send Road which are already extremely busy at peak times.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Please find this email as my objection to "insetting" the villages of Chilworth and Shalford. As a Chilworth resident I wholeheartedly feel that any further development in this beautiful area would be to its detriment. I very recently bought a home here where I live with my children and one of the biggest factors in making the decision to buy was the reasonable level of development. If there were any more development the area would look and feel completely different and we would lose the natural beauty of the area. Please note this as my formal objection to the above plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2961</th>
<th>Respondent: 15582593 / Dermot McMullan</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>I OBJECT to the proposed Infrastructure Schedule (Appendix C)</td>
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<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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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: PSLPS16/6038  Respondent: 15582593 / Dermot McMullan  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. Reference should be made to the evidence of numerous accidents for recent years. 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).

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. 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. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon 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.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing. 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 an inappropriate 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.

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).

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12344  Respondent: 15582593 / Dermot McMullan  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: PSLPP16/12353  Respondent: 15582593 / Dermot McMullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to 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:
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: PSLPP16/12356  Respondent: 15582593 / Dermot McMullan  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.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An
“English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</th>
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<td>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:</td>
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<p>| Comment ID: PSLPP16/12351  Respondent: 15582593 / Dermot McMullan  Agent: |</p>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</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 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12355  Respondent: 15582593 / Dermot McMullan  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 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 needs to be 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. 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”.

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. 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.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12345  **Respondent:** 15582593 / Dermot McMullan  **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.

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. 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.

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.

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.

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.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12346</th>
<th>Respondent: 15582593 / Dermot McMullan</th>
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<td>Document: <strong>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</strong></td>
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Do you consider this section of the document; 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12348</th>
<th>Respondent: 15582593 / Dermot McMullan</th>
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<td>Document: <strong>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</strong></td>
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Do you consider this section of the document; complies 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: PSLPP16/12339  Respondent: 15582593 / Dermot McMullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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. Sacrificing areas of the Green Belt 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. 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. 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.

This policy is wildly disproportionate in terms of any 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.
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12340  Respondent: 15582593 / Dermot McMullan  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: PSLPP16/12337  Respondent: 15582593 / Dermot McMullan  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.

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.

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:
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.

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.

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 doubt 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.

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. 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 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.

**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: PSLPP16/12357</th>
<th>Respondent: 15582593 / Dermot McMullan</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 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 Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly my 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.

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>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</th>
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<td>Document:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</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)

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: | 8QLP16/1467 | Respondent: | 15582593 / Dermot McMullan | Agent: |
|-------------|--------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness | |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise
demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBc has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBc has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBc has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented 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: SQLP16/1468  Respondent: 15582593 / Dermot McMullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6030  Respondent: 15582625 / Samantha Porter  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 Former Wisley Airfield being included in the Draft Local Plan, leaving nearby to this site and seeing on a
daily basis the already serious traffic issues around the M25/A3 junction I am shocked that the Councillors wish to see it
increase. To include this site is crazy it is unsustainable! The local plan is all about sustainability so I am shocked that
Councillors are allowing this site to be included. Please see sense and remove The Former Wisley Airfield from the Draft
Local Plan. I also object to the erosion of the Green Belt, once it is gone, we will never be able to get it back, please make
sure the Guildford Councillors are not responsible for such a serious mistake.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6031  Respondent: 15582657 / Andrew Goodchild  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): ()

Proposal to remove the Horsleys from the Green Belt, the Proposal to extend the boundaries of the settlement areas
of the Horsleys and the Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham

I am writing in connection with the proposal to remove the Horsleys from the Green Belt, the proposal to extend the
boundaries of the settlement areas of the Horsleys as well as the proposal to develop over 2000 homes at what was once the
Wisley Airfield in Ockham to all of which I object for the following reasons:

1. The proposed changes represent a fundamental breach of Metropolitan Green Belt rules: The GBC's Planning Officer said in relation to a previous planning application in relation to the Wisley Airfield site in rejecting the application said "It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified".

It is clearly stated in Ministerial Guidance that unfulfilled housing need does not qualify as very special circumstances
and therefore the removal of this site from the Green Belt is entirely unjustifiable in relation to the Metropolitan Green Belt
rules.

1. The proposed site at Wisley Airfield does not meet acceptable levels of Sustainability

In its Sustainability Appraisal of the Guildford Borough Local Plan issued in June 2016 AECOM rated this site as the worst
of the six sites in terms of sustainability with 8 out of the 21 criteria graded as Red (poor sustainability).

Amongst the factors that influenced this grading are the following: no public transport currently servicing the area, the
nearest train stations are more than 3 miles away, there is insufficient parking at both local stations to accommodate
additional commuters, there are no schools or medical services, new roads will be needed as travel from the proposed site will depend on motor vehicles etc.

In essence this is a proposal to create a large scale green field settlement in a poorly sited green field location.

1. **The site will have a severe impact on local traffic and infrastructure:**

The roads around East Horsley are to say the least poor with many being little more than winding lanes without pavements and the main through roads Forest Road and Ockham Road South and North pass through residential areas that are in many places narrow and unlit. Any increase in the local population will only put added pressure to the volume of traffic going through the village centre and in and around Horsley Station and Effingham Junction Station which will add to the congestion at peak hours. The likely further traffic congestion at the A3 / M25 intersection will only exacerbate the existing problems.

Other facilities in the Horsleys such as schools and the East Horsley Medical centre will not be able to cope with the additional population planned as a result of the Wisley Airfield and proposals for housing in the Horsleys.

4. **The development is totally out of keeping with the local character, context and distinctiveness:**

East Horsley with 1,760 homes is currently the largest settlement borough outside Guildford itself with a housing density of 8.1 dph within its settlement area. The proposal at Wisley Airfield is to build 2,100 homes, which is 19% more housing than in East Horsley at a density of 6 times as much (49.1dph) which is similar to that utilised in a metropolitan area. This sort of development is completely out of character for an area of rural Surrey and the character of the whole area would be irreparably damaged if the Wisley Airfield development goes ahead.

5. **New homes in the Horsleys:**

The plans indicate a further 173 homes in East Horsley and 420 in West Horsley, a total of

1. This results in an approximate increase of households of 10% in East Horsley and 35% in West Horsley. This will substantially increase the volume of traffic in the village not least when added to the likely number of motor vehicles if the proposed Wisley Airfield development also takes place. It will also put a strain on the village facilities such as schools, the medical centre and the stations all of which are at capacity now.

**In summary** it appears to me that the proposals for new homes in the Horsleys and at Wisley Airfield have been poorly thought out with little regard for the Metropolitan Green Belt rules. There has been a complete failure to consider the impact on the infrastructure and environment across a widespread area, the strain on local facilities and the fact that the proposed developments are totally out of character for the rural area of this part of Surrey.

I would therefore urge Guildford Borough Council not to countenance any development at the Wisley Airfield site and to considerably reduce the planned housing increase in the Horsleys.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
As a resident of Send, living in Send Barns Lane, near Burnt Common, I would like to register my objection to the Local Plan that proposes to build many new homes in the area (Garlick's Arch) and in particular proposes to create new north and south bound sliproads to and from the A3 to the A247 at Burnt Common, which will result in a huge amount of permanent congestion in the Burnt Common area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to 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:
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:

Comment ID: PSLPS16/6035  Respondent: 15582817 / Karsten Kollov  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 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:

Comment ID: PSLPS16/6037  Respondent: 15582817 / Karsten Kollov  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): ()

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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?

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?

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!!!!

Please confirm that you have received this communication of my objections and please ensure that these are shown to the planning inspector who is taking the decision

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 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: pslp172/246  Respondent: 15582817 / Karsten 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: pslp172/247  Respondent: 15582817 / Karsten Kollov  Agent:
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:

I OBJECT TO Send Village being removed from the Green Belt.

I OBJECT TO the disproportionate amount of development in one area of the Borough

400 HOUSES AND 7000sq METRES OF INDUSTRIAL SPACE AT GARRICKS LANE
40 HOUSES AND TWO TRAVELLERS PITCHES AT SEND HILL
45 HOUSES AT CLOCKBARN NURSERY
WISLEY SITE 2000 HOMES STILL IN THE LOCAL PLAN GOSDEN HILL 2,200 HOMES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12370</th>
<th>Respondent: 15582913 / Nigel Pink</th>
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<td>I OBJECT TO the lack of Doctors Surgeries to cope with increased residents</td>
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<td>HOW WILL THE ROYAL SURREY COPE WITH THOUSANDS MORE PATIENTS</td>
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<td>THATS IF THEY EVEN ARRIVE IN TIME FOR THEIR APPOINTMENT DUE TO</td>
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<td>SUCH CONGESTION AROUND THE CATHEDRAL EXIT ON THE A3</td>
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<td>I OBJECT TO lack of schools to cope with more residents.</td>
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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. all erosion of the Green Belt</td>
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### Comment ID: SQLP16/1469  Respondent: 15582913 / Nigel Pink  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 VERY SNEAKY LAST MINUTE INCLUSION OF NEW SITES (LESS THAN 2 WEEKS)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPS16/6043  Respondent: 15582945 / Kevin Memery  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):**

My main objections to the proposal by GBC to build houses and a school on sites in Normandy and Flexford are:

That it is an unnecessary intrusion on precious green belt land. GBC should make greater attempts to build on brown field sites within the town.

The infrastructure is inadequate to cope with the resulting increase in traffic.

It is unlikely that the main sewers will cope with the increased population. On the A 323 near the entrance to Slade Lane and Wyke Lane sewage has belched out of a manhole onto the road on several occasions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPS16/6048  Respondent: 15583073 / Alison Ford  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A15
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On behalf of The Cathedral Church of the Holy Spirit, Guildford and Linden Homes please find attached our submission brochure submitted in response to your consultation request regarding the Emerging Local Plan, Strategy and Sites document. Two printed copies of the brochure will be placed in the post to you as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Guildford Emerging Local Plan Submission Brochure 18 7 16.pdf (3.9 MB)

Comment ID: PSLPA16/2975  Respondent: 15583169 / Poul Jensen  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: PSLPA16/2976  Respondent: 15583169 / Poul Jensen  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: PSLPA16/2974  Respondent: 15583169 / Poul Jensen  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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6062  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6063  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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 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: PSLPP16/12409  Respondent: 15583169 / Poul Jensen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12418  Respondent: 15583169 / Poul Jensen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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: PSLPP16/12420  Respondent: 15583169 / Poul Jensen  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: PSLPP16/12405  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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: PSLPP16/12406  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment 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: PSLPP16/12407  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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: PSLPP16/12423  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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: PSLPP16/12417  Respondent: 15583169 / Poul Jensen  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: PSLPP16/12415  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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 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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12410</th>
<th>Respondent: 15583169 / Poul Jensen</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? ( )
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: PSLPP16/12412  Respondent: 15583169 / Poul Jensen  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: PSLPP16/12413  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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: PSLPP16/12401  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

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:** PSLPP16/12403  **Respondent:** 15583169 / Poul Jensen  **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:** PSLPP16/12397  **Respondent:** 15583169 / Poul Jensen  **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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<th>Respondent: 15583169 / Poul Jensen</th>
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I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing 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”.
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: SQLP16/1474  Respondent: 15583169 / Poul Jensen  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 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: SQLP16/1475  Respondent: 15583169 / Poul Jensen  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 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: SQLP16/1476  Respondent: 15583169 / Poul Jensen  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:
Do you consider this section of the 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:

As a resident of Guildford for some 36yrs I wish to object in the strongest possible terms to the Guildford Local Plan, which was hastily published and without an adequate time consultation period with local citizens. I object to the removal of our villages from the Green Belt, including my own village, Jacob’s Well. Such a course of action would allow developers to dramatically alter the structure and cohesiveness of local communities against the will of many existing residents whilst destroying rural / semi-rural areas forever.
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 addition, little or no provision has been made to improve the transport infrastructure in circumstances where our local roads and the A3 are already hugely congested and expensive public transport is neither reliable nor adequate. It is reasonable to assume that 13,000 extra homes will generate at least 20,000 extra cars leading to increased 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 do not believe an adequate case has been made out for an extra 13,000 homes to be built in the Borough over the next 17yrs or so. Much of the supporting data, hidden from public scrutiny and possibly produced by consultants with a vested interest in the building industry, seems to be based on anticipated growth using questionable figures which are perhaps even more questionable given the recent Brexit referendum, viz. if the UK goes into recession mid-way into such a large building project the town will end up looking a mess! (Just look at what happened in the Republic of Ireland post the 2008 global financial crash!).

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 urge Guildford Borough Council to reconsider their Local Plan taking into consideration my objections and, if necessary, for the Government Planning Inspector to rigorously examine every detail of the Plan and to do everything possible to protect the Green Belt and our already hard pressed communities from over development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6068  Respondent: 15583329 / Robert Morgan  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) in particular to the obscene scale of development in the Horsleys 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. It’s frankly a disgrace that it continues to be considered when it’s categorically not a suitable site for a new town.
• I object to the detrimental impact the proposed town at Wisley will have 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.

• With regards to the Horsleys specifically I am very concerned about the following:
  1. The in setting of the East Horsley settlement area from the Green Belt and the associated implications for development
  2. The scale of proposed development in West Horsley (35% increase) is totally absurd and will ruin the area for good. I see no proposed infrastructure improvements to cope with such a large number of new houses

This area of the Borough is attractive to residents because of its characteristics – a feeling of spaciousness, access to the countryside and infrastructure utilisation that makes for a high standard of life. The proposed development will unquestionably immeasurably worsen the lives of the existing residents because of the vast scale proposed. Limited development that is of an order of magnitude that befits the areas where it is proposed must be the only acceptable solution.

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 am writing to register my profound dissatisfaction with the amended local plan 2017. I live in Horsley and I am appalled at the scale of development the plan presents. It amounts to a zero sum game where more people will be using the same infrastructure meaning a worse quality of life for existing residents. Overall I would make the below comments:

- Including the proposed development at Three Farms Meadow, Horsley and the surrounds are shouldering far too high a proportion of the Plan’s housing proposals. Large scale housing should be built on brownfield and be placed around infrastructure that can support it.
- I am especially concerned about removing Horsley from the green belt meaning the villagers will be living under constant threat of development in places like the wonderful Horsley Tennis club or Kingston Meadows
- On the ludicrous proposals for the new town at Three Farms Meadows I have the below comments:
  - It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
  - It is further from railway stations than any other identified strategic site making it both unsustainable and a community reliant on cars thereby worsening the already appalling traffic
  - It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
  - Local roads are at capacity
  - 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.
  - There is insufficient employment available onsite so that almost all residents will have to travel to work.
  - 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.
  - 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.
  - I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
  - I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
  - I object to the removal of additional 3.1 ha from the green belt without any justification
  - I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
  - I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
  - I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
  - I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
• I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
• I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
• I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
• I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
• I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
• I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
• I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
• I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
• I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

Based on the above I consider the plan not fit for purpose. We are privileged to live in a sought after and beautiful part of the country. It’s incumbent upon us to preserve its character, open space and heritage. This plan equates to a decimation based on spurious housing numbers which, if enacted, would tarnish this area forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15583361 / Pat Moxon</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>As ratepayers of Effingham and Guildford Borough Council (GBC) we enclose our formal objection to key elements of the 2016 draft Local Plan.</td>
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<td>Our objections focus on the proposals impacting Effingham, Wisley and The Horsleys in particular and to the extremely high number of homes suggested as needed across Guildford.</td>
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As a general principle we find the plan, much like the draft of 2014, to run contrary to the original aims of the National Planning and Policy Framework (NPPF) and clearly at odds with the promises of green belt protection offered by all parties including the Conservatives and Liberal Democrats prior to the most recent general election.

We object in the strongest terms to the insetting of small villages including Effingham, believing this to be unjustified and unsound.

Our key objections are referenced according to the draft plan documentation policies and sections as noted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6070  Respondent: 15583393 / Jane Buckingham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Proposed Submission Local Plan: Strategy and Sites 2016 – Part 2 Sites

Objections are related to particularly high volume inappropriate developments in the green belt and lack of exceptional circumstances.

- A35 LAND AT FORMER WISLEY AIRFIELD (Objection)
  - 2000 homes? Too large, unsustainable, and the developers’ marketing desire to brand this “brownfield” development is simply untrue, as anyone aware of the history of the site is aware.
  - This is disproportionate green belt development with no supporting infrastructure whatsoever. The M25 and A3 and local roads simply cannot cope with this high increase in car journeys, they are often gridlocked today, and public transport in the area barely exists. The suggestion of securing a bus service “in perpetuity” is highly misleading by the draft plan authors, will Guildford be purchasing their own bus franchise and setting eternal terms and conditions and bus routes? We think not. Such a feat “in perpetuity” is impossible, and in fact Effingham barely has a bus service today. The roads and facilities in adjoining villages will suffer significantly through this lack of infrastructure and misleading positioning by the authors.
  - Guildford’s own planning committee refused this development recently and we are mystified as to why this is included. It suggests something here does not ring true and requires closer scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12436  Respondent: 15583393 / Jane Buckingham  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): ()


There are clear inconsistencies within the plan itself and with the NPPF.

- Section 3 SPATIAL VISION (Objection)
  - Appropriate constraints (such as green belt) have not been applied to reduce the housing targets to a realistic level.
  - The draft plan’s stated preference for brownfield development has not been applied consistently in subsequent sections.
  - Clear examples are shown in our comments on section 4 below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12438  Respondent: 15583393 / Jane Buckingham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Section 4 - POLICY P2 – GREEN BELT (Objection)
  - Objection in whole to the insetting of Effingham, Ripley, Horsleys. A legally binding Act of Parliament created the green belt as a permanent feature. We strongly question the legality of such a move.
  - The draft plan itself restates green belt aims such as keeping the land “permanently open”. We are aghast as to how Guildford Borough Council determined that these small villages, surrounded in and out by greenery and open land, do not fit, or warrant, this description and protection. Have the assessors actually visited the locations, or simply decided the outer edges of urban Guildford are ripe to be sacrificed to developers, being relatively far away from the council hub itself? Today, Effingham is a small village of only c1000 homes in green belt.
  - The plan confirms national policy in that, “Exceptional circumstances are required to amend green belt boundaries” in 4.3.16 yet the plan does not prove exceptional circumstances exist. It has been debated and confirmed in the UK parliament in recent years that housing need alone does not represent exceptional circumstances.
  - This proposal to inset in 4.3.13 must be reversed. It is clearly driven by unsubstantiated and unrestricted housing targets and has not taken into account infrastructure limitations and flooding concerns. Effingham in particular has severe infrastructure limitations, frequent flooding and does not even have a doctor’s surgery. Insetting the village will leave it prey to speculative, inappropriate development and encroachment at odds with the NPPF and the local community’s desires (localism).
and capability to manage such over-development. The nature of the village provides few options for improvements via widening or new roads, it is irresponsible to propose to inset it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12437  Respondent: 15583393 / Jane Buckingham  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Section 4 - POLICY S2 – BOROUGH WIDE STRATEGY (Objection)
  - The target of 13,860 homes is higher than the 2014 plan’s 13,040 target. Alarming, considering the high objections to this figure in the 2014 public consultation. Again, the source data and calculations have not been released to public scrutiny and green belt constraints have not been applied in reducing targets. This should be rectified.
  - Table 1 in 4.1.13 confirms that new green belt development forms a high proportion of development. Despite section 3.2 stating a preference for brownfield development there is no category within the table clarifying how this is being applied. The vision itself is not being applied to each policy consistently.
  - The original intent of the green belt was a permanent feature, not a reservoir for development. Adoption of unfeasible targets to justify the need for development replicates the flawed agenda of the Green Belt and Countryside Study (GBCS).

The Brexit decision has surely rendered previously calculated targets out of date. The targets require reassessment with urgency and cannot be adopted without question under the new circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2982  Respondent: 15583457 / Claire Parker  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 herewith write to vehemently object to the Proposed Submission Local Plan: Strategies and Sites June 2016. The number of proposed new homes is too high and unsustainable for Guildford’s villages.

I object on the following grounds:

I object to the erosion of the Green Belt. By extending the boundaries of the village mentioned in 2003 Local Plan Settlement Area, the village has been removed from the Green Belt. This is in conflict with the statement in Policy P2, “We will continue to protect the Metropolitan Green Belt against inappropriate development.”

I also object on the grounds that the village and surrounding areas do not have sufficient infrastructure to support such developments.

- Schools and doctors’ surgeries are at/near maximum capacity
- Roads, bus services and trains into London are already under immense strain.
- Surface water drainage is already a problem and would become hazardous if the problem became worse.

As a resident of West Horsley, I object to the targeted 35% increase in current village housing by 2022. This is clearly inconsistent with the likely population increase over this period and the need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The Parish Council has identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for the young and elderly.

West Horsley, a small, Greenbelt village can simply not sustain this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for the young and elderly.

West Horsley, a small, Greenbelt village can simply not sustain this development.

I sincerely hope that our villages will be protected from these development proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16204  Respondent: 15583457 / Claire 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 am writing in objection to the Proposed Submission Local Plan: Strategies and Sites June 2016. I currently reside in West Horsley and am totally against the plans for removing the village from the green belt which is against the statement in Policy P2 stating "We will continue to protect the Metropolitan Green Belt against inappropriate development" One of the reasons I moved to the village is the fact that we are surrounded by nature and can escape the craziness of the city.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2985  Respondent: 15583489 / Sonia Bowen-Perkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write in regards to the Local Plan to advise you that I object to these plans. These plans (policy A42, A43, A43a, A44) put our local greenbelt area at risk. I have a young family and purposely moved to this area due to the nice, local, quiet countryside that it offers - this is severely at risk should these plans go ahead. I do not feel it is necessary for so many houses or traveller sites in this area particularly on greenbelt land and instead urge you to look at using Brown Field land to protect our precious countryside which, once built on, is lost forever.

I trust that common sense will prevail and you will amend the plans to protect our greenbelt land and our characterful villages.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2987  Respondent: 15583521 / Richard Moxon  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): ()

Examination 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: PSLPP16/12441  Respondent: 15583521 / Richard Moxon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt I object to any 'in-setting' of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12442  Respondent: 15583521 / Richard Moxon  Agent:

Document: Proposed Submission Local Plan: strategy 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 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 the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposal that Send village be removed from the green belt.

The maintenance of the green belt has been a priority of Government and supported by all parties and it should be extremely difficult to remove an area from such protection.

Guildford Council glibly propose that 'insetting' is ok for Send in their discussion document 4-3-12 and 4-3-16 as there is apparently nothing special about the village. They suggest there are other ways to protect the environment, but we all know what will happen if it became convenient to ignore such protection.

There is no benefit to change from a system that already gives us protection.
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 proposals to build on land known as "Garlick's Arch"

Proposal A 43.

There are no justifiable reasons for ripping out an area of ancient woodland and is an example of why the green belt has to be maintained almost at any cost.

Part of the site is below the road level of the A3 and would require an enormous amount of earthworks similar to that at Burpham to provide sound absorption and diffusion.

There is no particular need for industrial space to be on our doorstep, as we have moved on from the 18th century and do not need a workplace just round the corner from where we live. There is a perfectly good industrial park at Slyfield Green, but a few minutes away, and with the ability to expand onto relatively poor land if there was such a demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses and 2 travellers pitches at Send Hill. Proposal A 44.

The proposed development is completely inappropriate in a high amenity area.
I find it unbelievable that the council would even begin to contemplate such a development. In my time of living in Send this was an active rubbish tip, that the council have registered as containing unsafe waste, and currently has vent pipes to disperse the gas generated from within.

A few years ago, alongside the proposed site, individual plots of land were sold off at auction and the council made it known that planning was unlikely to be available in the “foreseeable future”. My how times change.

The access road is of very poor quality, it being a single track road descending quite sharply to the junction with Potters Lane.

There are regularly difficulties encountered by traffic meeting half way up the hill.

Historically it is an accident black spot as the junction with Potters Lane is on a hidden bend.

This site has never formed part of any discussions or consultations with residents over planning matters and may be part of the councils “Rural exception homes plan” as Send and East Horsley have been selected as suitable. (ref 4.2.47)

I wish these comments to be passed to the planning inspector who will decide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2959  **Respondent:** 15583553 / Malcolm Murray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I Object to the Policy A42 change at Clockbarn in Tannery Lane

because the proposed increase to 60 houses is pushing the limit for how the local infrastructure can cope in particular the narrowness of Tannery Lane for which there is probably no resolution without demolishing existing properties and also the very poor sightlines on the junction with the A247.

When the original proposals were published I did not object as the village does need extra houses but this is typical council thinking that if few people object then they can pile even more houses on to the plan and get away with it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2962  **Respondent:** 15583553 / Malcolm Murray  **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 the proposal is still completely irresponsible in it's destruction of historic woodland without bothering to find some justification or exceptional circumstances to warrant this course of action.

The proposed area for the development is alongside of the A3 and is either level with or below the road level, which will require enormous sound barriers to be built to make the homes habitable.

One of the purposes of the Green Belt was to stop uncontrolled ribbon development along highways between individual towns and villages and this proposal will remove at a stroke the majority of the separation between Send and Ripley.

The Local Plan H1 Policy states that 'where there is an identified need sites for Gypsy, Traveller or Travelling Showpeople should be provided on developments of 500 homes or more, yet this requirement seems to be thrown out of the window when it comes to developments in Send. Is it related to the fact we have elected 'Independent' councillors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2965  Respondent: 15583553 / Malcolm Murray  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 the changes from the previous proposals which were rejected, now make the potential development unlimited and is an indication of the perverse and irrational thinking of the council.

Why, when there is already an existing industrial and warehousing estate just 2 miles away with unused space and space to expand, would you build an unnecessary carbon copy.

There clearly needs to be a resolution, by discussion, as to how this piece of land created by the building of the Ripley Bypass can be brought into a useful asset for the community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1343  Respondent: 15583553 / Malcolm Murray  Agent:
I Object to the Proposal to Inset Send Business Park from the Green Belt

There is no benefit to the community from changing from the present status of the business park which has evolved over many years.

By changing the status it would be a toehold for possible future development plans and clearly this is the only reason the Council is including it in the plan.

The problems with traffic movement on Tannery Lane and the A247 junction have already been highlighted in the objections over the Clockbarn Nursery above, also apply to this site.

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)

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:
** 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:

** 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.

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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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**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)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

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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 congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

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** 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?

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Comment ID: PSLPP16/12241  Respondent: 15583585 / Josephine Rooke  Agent:

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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:

Comment ID: PSLPP16/12465  Respondent: 15583585 / Josephine Rooke  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to poor air quality concerns (Policy 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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Do you consider this section of the document; complies 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?

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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: PSLPP16/12212  Respondent: 15583585 / Josephine Rooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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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?

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Comment ID: PSLPP16/12459  Respondent: 15583585 / Josephine Rooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** 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: PSLPA16/3001  Respondent: 15583617 / Deborah Gillam  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: PSLPA16/2996  Respondent: 15583617 / Deborah Gillam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPS16/6081  Respondent: 15583617 / Deborah Gillam  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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Comment ID: PSLPS16/6080  Respondent: 15583617 / Deborah Gillam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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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): ()

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/12453  Respondent: 15583617 / Deborah Gillam  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): ( )

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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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12444  Respondent: 15583617 / Deborah Gillam  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 infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?
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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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**I especially OBJECT to policies A36, A37, A38, A39, A40 & A41:**

- The amount of new housing far exceeds local need.
- Housing density would be excessive when compared with existing development.
- The plan would transform the Horsleys into a sizable town, something for which no case is made.
- There is no local support.
- The collective impact of these 6 sites on a small part of the borough is not considered. These should not be treated as isolated, separate sites.
- The sites are unsustainable. 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.
- No account has been taken of additional impact of Wisley Airfield site on Horsleys.
• The extension of settlement boundaries is too permissive. The Horsleys are characterised by streets with development along only one side of the road. The policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.

• The Green Belt gap with neighbouring settlements would be hugely narrowed, especially if Wisley Airfield is built on.

• Policy A40 is especially unviable because of high water table and poor drainage, leading to regular winter flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6074  Respondent: 15583649 / Sheila Attridge  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):

• This should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.

• There is the question of the 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).

• No Green Belt “exceptional circumstances” are presented.

• This is not a brownfield site as stated – only 15% of it.

• Proposed SCC waste site is ignored.

• Loss of farming land.

• The site is too near RHS Wisley and Thames Basin Heath SPA.

• SANG would harm on SPA.

• Development will aggravate traffic jams at A3 roundabout and M25 Junction 10.

• There would be an unacceptable increase in air pollution.

• No existing public transport, and stations are miles away.

• No proper traffic data exist.

• Housing density would be far too great.

• Over 2,000 houses would swamp and destroy Ockham conservation area, with impact on listed buildings.

• Access is confined to inadequate narrow lanes.

• The water table and surface water flooding are not considered either for site itself or for downstream areas on River Mole.

• There would result a major impact on neighbouring villages, especially the Horsleys (see above).

• No assessment has been made of the collective impact on area of this and 6 Horsley sites (see above).

It is my belief that this policy would be catastrophic for the character of the area and the well being of existing residents. I OBJECT in the strongest possible terms

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WISLEY SITE 2000 HOMES STILL IN THE LOCAL PLAN

GOSDEN HILL 2,200 HOMES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6075  Respondent: 15583681 / Laurence Pink  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 A43a on off ramp at Clandon

THE A3 CAN'T COPE WITH THE TRAFFIC !!!!!!!

SEND ROAD WILL BECOME EVEN MORE OVERLOADED CHAOS ON OUR LOCAL ROADS

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6109  Respondent: 15583681 / Laurence Pink  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 A43a on off ramp at Clandon

The A3 can't cope with the traffic !!!!!!!

Send road will become even more overloaded

Chaos on our 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: PSLPP16/12457  Respondent: 15583681 / Laurence Pink  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 Doctors Surgeries to cope with increased residents

How will the Royal Surrey cope with thousands more patients

Where will they park ????

That's if they even arrive in time for their appointment due to such congestion around the Cathedral exit on the A3

I object to lack of schools to cope with more residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12560  Respondent: 15583681 / Laurence Pink  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 all erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1487</th>
<th>Respondent:</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 limited consultation period

VERY SNEAKY LAST MINUTE INCLUSION OF NEW SITES (LESS THAN 2 WEEKS )

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>PSLPS16/6085</th>
<th>Respondent:</th>
<th>15583745 / Jane Friend</th>
<th>Agent:</th>
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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.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
  7. Whilst I live in Elmbridge I consider that this proposal will severely impact Cobham and Stoke D’Abernon as well. Its inconceivable that Cobham will not suffer substantially increased traffic, to the railway station in particular which is bound to share some of the load with the designated stations.
  8. I also regularly enjoy the tranquil environment of the public footpaths across this local area and shudder to contemplate the impact of the equivalent of a new town being squeezed onto this site.

• 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: PSLPA16/3004  Respondent: 15583777 / Adam Lee  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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 Strategic Housing Market SHMA figure of 693 houses per annum as GBC refuses to publish the report and verify the figures</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 congestion that development will cause and the lack of road infrastructure</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>Comment ID: PSLPP16/12492  Respondent: 15583777 / Adam Lee  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>I object to not protecting the Green Belt.</td>
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Comment ID: pslp173/44  Respondent: 15583777 / Adam Lee  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 4.3.15 (Send Business Park) being taken 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: pslp172/379  Respondent: 15583777 / Adam Lee  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 Policy A35 (former Wisley Airfield) due to the increase to 95.9 hectares. The volume of traffic and pollution levels around this site would be 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: pslp172/380  Respondent: 15583777 / Adam Lee  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 (Cockburn Nursery) due to the increase of homes from 45 to 60 homes - a 33% increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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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**Comment ID:** PSLPA16/3007  **Respondent:** 15583809 / Nigel Stephenson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the 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 clearly state 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: PSLPS16/6087  Respondent: 15583809 / Nigel Stephenson  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 major 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: PSLPP16/12499  Respondent: 15583809 / Nigel Stephenson  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 and much other woodland.

   What changes (2016)/further amendments (2017) do you suggest should be made to the document?

   Attached documents:

   **Comment ID:** PSLPP16/12504  **Respondent:** 15583809 / Nigel Stephenson  **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 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:** PSLPP16/12496  **Respondent:** 15583809 / Nigel Stephenson  **Agent:**

   **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

   Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

   Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
   There is far too much traffic in our villages now 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 for the most part narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12505  Respondent: 15583809 / Nigel Stephenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy I1)
   The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

   There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12506  Respondent: 15583809 / Nigel Stephenson  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. 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: PSLPP16/12502  Respondent: 15583809 / Nigel Stephenson  Agent:
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. This would be terrible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12495  Respondent: 15583809 / Nigel Stephenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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.

   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: PSLPP16/12497  Respondent: 15583809 / Nigel Stephenson  Agent:
1. I object to development in areas which are at risk of flooding (Policy P4)

This 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 much higher risk than the Council’s own assessment. The 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: PSLPP16/12494  Respondent: 15583809 / Nigel Stephenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is clearly unsustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. These local communities do not need any more houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will of course have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch at all

The development should be in urban areas where there is a measure of sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12498  Respondent: 15583809 / Nigel Stephenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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 isn’t balanced across the borough; there’s far 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 of course 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: PSLPA16/3009  Respondent: 15583841 / Catherine Young  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 trains run a frequent service to both London and Guildford, access to the station car park is hazardous and parking on a weekday is very limited.

I do believe that GBC need to carefully consider where all the cars are going to go should these new developments proceed. The road I live down is already crowded with residents already having to park across pavements, preventing people from walking along the pavement, and blocking access for the disabled. This is the same in neighboring Farley’s Close and also along Long Reach itself – probably not GBC but Surrey County Council – but at the end of the day, this area cannot take anymore vehicles – we are at bursting point!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6090  Respondent: 15583841 / Catherine Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham. I OBJECT to the inclusion of this site as I believe it is a fundamental breach of the Metropolitan Green Belt Rules.

Earlier this year this site was refused planning permission on over 14 counts – why on earth is it back in?

The proposed development represents a fundamental breach of Metropolitan Green Belt rules: The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: “It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified”.

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Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers’ previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon ‘exceptional circumstances’, which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing. Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

I trust that you will take my views into account, and I would appreciate acknowledgement of receipt of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12509  **Respondent:** 15583841 / Catherine Young  **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:** Schools in West Horsley are full every year, and this has been the situation for many years.

Secondary school places are limited in number at the Howard of Effingham School and other secondary schools involve a much longer journey of time and distance from the village to reach them. Glenesk and Cranmore private schools are well supported by many families living in Guildford and other villages up to 14 miles away. Each of these private schools during term time, receives high volumes of traffic going to and from each school at each end of the school day, on Ockham Road North and the A246 respectively, leading to severe congestion on these and surrounding roads.

If a further 385 homes are built in West Horsley, the children in East Horsley will never find a place locally, and as suggested by SCC, children even in our own village will need to fill places in Clandon and Ripley. There is simply not enough school places available locally to meet the needs of our village, and we cannot rely on a new school at Wisley, as this is site has been refused outline planning consent on over 14 separate counts by GBC, so is a long way off from being realised, if ever.

There is no new provision made within the Draft Local Plan and its supporting evidence to address this, which as a parent I find totally unacceptable.

**Medical facilities:** It is already extremely difficult to get an appointment at the Doctor’s surgery, let alone be able to park in the limited number of spaces available (approx. 10 spaces). The doctors are working flat out, have tried to accommodate residents by opening at different times, and are doing all that they can. But with the level of development proposed they will no longer be able to operate effectively and we will see more and more people having to attend the Royal Surrey and Woking Hospitals walk in clinics. What plans to expand these hospitals have been put forward by GBC? None.

**Other facilities:** There is one small grocery store at the southern end West Horsley, which will close later this year due to retirement of the owner. The only post office has closed. Many people use the shops and library in East Horsley that has been designated in the plan as a ‘District Centre’. This is a complete misreading of the facilities in the village centre. Parking has already become increasingly difficult and these facilities will be woefully inadequate to support the proposed
increase in population. It is worth considering that if every new house has 2 cars, this will mean potentially 6000 more cars within a three mile radius of the Horsley Villages. This will have a severe impact on our local roads. This increased volume of traffic will also lead to an increase in pollution, notable in nitrogen dioxide particles being released into the environment – already a cause for concern in several areas within the Borough, which GBC are failing to monitor!

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: PSLPP16/12510</th>
<th>Respondent: 15583841 / Catherine Young</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): ()

**Transport:** Listen to the local traffic news any day of the week and there are issues on the A3 into Guildford. It is also extremely difficult to even join the M25 at Junction 10 if you are travelling in the Heathrow direction for business or pleasure, unless you are prepared to leave at 6am, and that includes the weekend! Where do you think all these extra people are going to work? The majority of them will travel on the A3 in either direction causing extra congestion. The condition of the local roads which will need to support this extra traffic. Long Reach, Ockham Road North and the A246 are in need of repair and Long Reach in particular is in no state for extra traffic and would be difficult to widen due to the established trees along its length. Indeed it is currently suffering from severe subsidence in many places so you have to be extremely careful when driving along this road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/12511</th>
<th>Respondent: 15583841 / Catherine Young</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): ()

**Waste Water Infrastructure:** This is inadequate in West Horsley and the surrounding area, with frequent flooding of gardens and roads. You have only to look at the GBC Surface Water management Plan, 2014 to see how terribly the Horsley’s are affected. The map within this document clearly illustrates that the Horsley’s are the largest area within the Borough to be called a surface flooding ‘Hot Spot’. However, no provision is made within the Draft Local Plan to address this, and this area is not even mentioned as a cause for concern – why is this? Surely GBC has a responsibility to direct development away from areas affected by flooding, and also to protect the natural flood plain?
In addition, Thames Water has advised Guildford Borough Council that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley will need to be upgraded to cope. Thames Water advises ‘a 2 to 3 years lead-in period’ to install the necessary wastewater network and treatment capacity after planning permission for a development is granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12507  Respondent: 15583841 / Catherine Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy states “We will continue to protect the Metropolitan Green Belt against inappropriate development”. However, Guildford Borough Council (GBC) have chosen to contradict themselves by ‘insetting’ West Horsley (and a number of other local villages, including our neighbouring East Horsley) from the Green Belt, and in addition extending the 2003 Local Plan Settlement Boundaries so that even less of the Village benefits from this National Level of protection afforded under the NPPF.

The new settlement boundary makes the situation much worse as it includes many of the fields and open spaces that give West Horsley it’s distinctive ‘open and rural character’ which would now be under threat, as many of these areas which may not be in the Land Availability Assessment at the moment, could be added in the future. The new settlement boundary proposed also extends around a significant number of gardens, and therefore lays West Horsley open to ‘garden grabbing’, a further factor that would change the character of the area, and one that we do not experience at the moment.

Described as being ‘washed over’ by the Green Belt, West Horsley is now to be the target for 385 new homes across four development sites – a 35% increase on the current number of homes. How can this be right, when Guildford Town is only going to get 11%? There are a considerable amount of Brownfield sites within the Guildford Urban area that should be being considered before the scale of development suggested by GBC for the East side of the Borough (2068 houses at Wisley 2.1 miles away, 2000 houses at Gosden Hill Farm 4.2 miles away, and 400 houses at Burnt Common 3.2 miles away) is even suggested.

It is my view that no exceptional circumstances have been proven to justify the changing of the Green Belt, the Settlement boundaries, and the insetting of West Horsley, thereby removing the Green Belt status of our village and therefore I object to Policy P2 on these grounds.

Could GBC please remember the fundamental principles of the Planning Practice Guidance, which clearly states that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify Green Belt development? In addition the NPPF states that need alone is not the only factor to be considered when drawing up a Local Plan.

I also OBJECT to the fact that the new draft Local Plan sees 8,202 (64.6%) of all proposed new homes to be built in the Green Belt, and I do not believe these exceptional circumstances have been demonstrated to justify this scale of development on the Metropolitan Green Belt.
As well as the scale of the development proposed and the locations within the current Green Belt, I also **OBJECT** to the densities proposed in the new draft Local Plan for West Horsley. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of Listed (40 plus) and significant Historic buildings. Existing densities are much lower than those proposed for each of the 4 identified development sites. This is not acceptable as it would completely change the character and nature of the Village.

As a reminder:

The National Planning Policy Framework (NPPF) requires that new residential development MUST respect the character and density of housing in the area and be limited by the availability of infrastructure and local facilities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/12508  **Respondent:** 15583841 / Catherine Young  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages, and I **OBJECT** to this number proposed.

A number of reports have been produced independently from GBC (one by the Guildford Residents Association GRA, and one by one of our local Ward Councillors that clearly show the number of houses planned for each year (693) is far too high, and does not take into account the way numbers are affected and inflated by Guildford’s migratory student population. Neither does it factor in any possible changes to the population growth if Britain was to leave the EU, which indeed it has. There should have been some allowance built in for this.

I strongly **OBJECT** to fact that the method used by GL Hearn to identify the number of new homes required remains out of the public domain – this to me is **a serious with holding of information** which makes the whole draft Local Plan unsubstantiated, if not just plainly incorrect!

In addition, the proposed expansion of West Horsley is unsustainable, and I therefore **OBJECT** to Policy S1. The Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighboring villages, so why are so many homes planned for this area? Who is going to live in them? Why are the urban areas not being developed proportionally? It just doesn’t make sense.

I do believe there is a case for some low cost housing to keep some people in the village, but I see no sense in re-locating those already struggling to find housing/employment in other areas of the borough and placing them in a situation which makes getting a job harder because of access to employment or transport links. I believe it could become a sink estate for people being moved out of the metropolitan area. The West Horsley Parish Council and Surrey Community Action Housing Survey (May 2014) identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish to downsize to a smaller home- which in turn would free up larger family homes and allow flow in the property market. This should be taken into consideration, and it has not!

‘Affordable’ homes, under national definitions, mean homes that are sold or rented at 80% of market value. Even at 70% as proposed these homes would be well out of the reach of most people’s means and starter homes will still not be available to
local people. Please look at the average cost of housing in this area and hopefully it will become clear eventually to GBC that young people and the elderly are never going to be able to afford what would be classed as an ‘affordable’ home in this area. It was reported last year in the Daily telegraph that the average cost of a home in East Horsley, our neighboring village, was £1.5 million! In the road that I live in, a ¾ bedroom semi-detached home sold for £550,000 October 2015.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
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<th>pslp172/3449  Respondent: 15583841 / Catherine Young  Agent:</th>
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<td>Document:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>In particular I OBJECT to the continued inclusion of sites A36 to 41 (East and West Horsley). The latest version of the proposed Local Plan reduces the number of sites proposed in this area but 4 remain with a proposed total of 395 new homes. This to me is not in proportion to the rest of the Borough. There seems to me to be no regard to the impact that this number of new homes will have on the immediate area, given also the proposed number of new homes at Site A35 only 2 miles away. In addition the density of new housing proposed on these sites is far too high compared to that of the local area and no regard appears to have been given to 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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<td>I OBJECT to Policy H1 where the constraints on housing density have been deleted. This leaves all villages and other areas in the Borough extremely vulnerable to developers needs. Density guidelines should be a key part of any planning document and therefore this should be reviewed and added back in to the proposed Local Plan.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>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 Policy P1 and E5 regarding the AONB, and AGLV land. I believe protection of the AONB has now been weakened by the re-wording of the levels of protection regarding types of development, and this policy should be strengthened to protect this national asset.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3773</th>
<th>Respondent: 15583905 / Catherine Hamilton</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth</td>
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Do you consider this section of the 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 and or amendment of the green belt protection area from Chilworth, Surrey and the number of the other villages in the Guildford area which are proposed in the Guildford Local plan 2016.

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 live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].

Myself and my family have just recently moved to Chilworth and what brought us here was the amazing greenery and wildlife, but taking away the green belt we will lose this (especially where we live!) By building houses (in an already busy village) the impact of what would be increased traffic down New Road, Dorking Road, Christmas Hill and Shalford will be such that it will be almost impossible to drive to Guildford, Cranleigh or Godalming during what already is an extremely busy rush hour! The safety of our children down these roads I think will also be compromised because of this increased 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: PSLPA16/3013</th>
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<tr>
<td>Document:</td>
<td>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 2016 draft local plan on the following grounds

- the lack of immediate provision for new schools.
- 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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<tr>
<th>Comment ID: PSLPA16/3012</th>
<th>Respondent: 15583937 / Brian Astley</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the 2016 draft local plan on the following grounds

- the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12516</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 2016 draft local plan on the following grounds

- all erosion of the Green Belt.
- any "in-setting" (i.e. removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12517</th>
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</table>
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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 on the following grounds
-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: SQLP16/1482  Respondent: 15583937 / Brian Astley  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 2016 draft local plan on the following grounds
-the limited consultation period.
-the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6094  Respondent: 15583969 / Tim Key  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 believe that the proposal to develop over 2,000 new houses at Ockham - and also the proposed development on Ockham Road North - will not only significantly damage the local infrastructure, which is already stretched, but also have a serious and long lasting negative environmental impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12518  Respondent: 15583969 / Tim 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 live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and would like to object to aspects of the proposed local plan for Guildford.

In particular, I object to the proposal to remove East Horsley from the Green Belt area, believing that the exceptional circumstances required for such an action have not been met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12519  Respondent: 15583969 / Tim Key  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 some change is inevitable, but do not believe that the proposals provide the kind of change that is actually needed and instead will do irrevocable damage and set a course for further substantial developments. More than anything, I believe that green belt lands should be protected and treated as such.

I hope you will take my opinions into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6095  Respondent: 15584001 / Lorna Thompson  Agent:  

I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and would like to object to aspects of the proposed local plan for Guildford.

In particular, I object to the proposal to remove East Horsley from the Green Belt area, believing that the exceptional circumstances required for such an action have not been met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to 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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**Comment ID:** PSLPP16/12522  **Respondent:** 15584001 / Lorna Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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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

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:** PSLPP16/12527  **Respondent:** 15584001 / Lorna Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12521  Respondent: 15584001 / Lorna Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to 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

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: PSLPP16/12524  Respondent: 15584001 / Lorna Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12520  Respondent: 15584001 / Lorna Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructures. 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: PSLPA16/3016  Respondent: 15584033 / Andrew Hutton  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): ()

Where is the evidence of the SHMA which is NOT revealed in the plan, nor, apparently to Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3015  Respondent: 15584033 / Andrew Hutton  Agent:
I am writing in connection with the New Local Plan published on 26th June 2016
Main Objections and Concerns in respect of East and West Horsley
Removal of both Horsleys from the Green Belt. No exceptional circumstances have been detailed.
Extension of the boundaries of the Settlement areas of the Horsleys. No reasons given to the above.
Current infrastructure is already a disgrace. Roads are incapable of managing existing traffic volumes. Car parks at local stations are full. No scope to widen roads in either of the Horsleys. The local schools are full and waiting times at medical centres are long.
The revised development of 2000 houses at the old Wisley Airfield will have an enormous impact on the Horsleys. An extra 4000 vehicles will raise pollution levels dramatically and create gridlock on the current potholed road system. The plan also includes large developments at Waterloo Farm, Manor Farm, Ockham Road North, East Lane, Thatcher's Hotel and Bell & Colvill.

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): ()

**West Horsley**

I object to Policy A37 as this site, proposed by GBC for 40 houses (many times the existing density of the village), would be an inappropriate development in a **Conservation Area within 500 metres of at least 5 listed houses**. House no 20 The Street, and its land has been added to this site (called the Bell and Colvill site) since the publication of the 2015 Draft LP, but is not shown on the new DLP as a change. What value, if any, would Conservation areas have, if GBC allows building in this area?

Also, note that permission has already been granted for 9 houses on the former Bell and Colvill workshop, small show room and 3 cottages, all perfectly acceptable as this is a brownfield site, the rest is not.

I approve of the decision to remove site 41 in West Horsley from the DLP.

I approve of the decision to remove the Thatchers Hotel site from the DLP.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/530  **Respondent:** 15584033 / Andrew Hutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy D1 Place Shaping**

I object to 4.5.8 which formerly was a reference to development, responding to local character, history or vernacular architecture. This direction has been removed, indeed GBC appear to be encouraging unsuitable modern buildings in sensitive sites.

GBC have removed all reference to sensitive development, including being aware of and noting the characteristics of an area, constraints such as hedges and trees, and local distinctiveness.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/528  **Respondent:** 15584033 / Andrew Hutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

Under the Draft Local Plan Strategic Policies 41/S1/4.1.1 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

House of Commons Briefing Paper; Planning for Housing no 03741, 14 June 2017

Guidance on taking account of constraints.

“need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes

“land designated as Green Belt” and “SSSIs”.

“The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/533  Respondent: 15584033 / Andrew Hutton  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): ()

SHMA

I object to the fact that research resulting in the SHMA has not been made public

GBC have broken a lot of rules in preparing the SHMA.

They subcontracted to GL Hearn, who subcontracted the work to Justin Gardner. This was against their own rules. Justin Gardner then claimed that the research which led to the numbers of houses needed was their “intellectual property”,

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therefore they were not obliged to share this information with anyone, not even the Councillors! Mr Spooner, Leader of the Council, claims not to have seen the research. How can he and his executive team make any reasoned decision without seeing the evidence?

The document Strategic Housing Market Planning states that consultants “should ensure that there will be no data protection or commercial restrictions on the storage and sharing of data used in the assessments”. This was not done.

The Strategic Housing Market Assessment Practice Guidance document V2 Aug 2007 (1.1.2.5) states that “assumptions, judgements and findings are fully justified and presented in an open and transparent manner.” This has not been done.

These last two points have been entirely and ruthlessly ignored by GBC as they have refused on many occasions, even when information was requested under the FOI Act to divulge any research.

With regards to the student numbers in Guildford, the fact that most of them leave and live elsewhere, after finishing their degree, has not been taken into consideration, and plans to accommodate students have skewed the numbers of houses required by the GBC, probably by about 25%.

The University should be forced to build the student accommodation for which it was given land and building permission. GBC should not allow any further increase in student numbers, nor any further buildings on the site, until the university has fulfilled their agreements regarding student accommodation. This would release large numbers of inexpensive flats in Guildford for local occupation and reduce the numbers of houses needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
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<th>pslp171/532</th>
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Infrastructure

I object to most of GBC’s plans as they have proposed no realistic infrastructure improvements.

The A3/M25 interchange will cause even more air pollution than already exists, which is well above permitted levels for development.

It will swallow up huge amounts of common land.

It will direct Wisley Garden traffic onto an already over-used junction (Ripley/East Horsley), which, it is suggested will also be the exit and entrance point for the proposed development of Three Farms Meadows, (erroneously re-named Wisley airfield).

The congestion will result in tailbacks even further West in a London-bound direction, along the A3, than there are at present. (often 2 miles before the A3/M25 junction)
Ripley is threatened with ALL the traffic from Wisley, heading West on the A3, going through the village, which was bypassed in order to reduce the traffic.

I object to the plans to close roads around Wisley or to make some one way only. This will be very disruptive to traffic from other places trying to get through Ripley, or on to the A3 or from Ockham to Cobham.

**A3**: There are no proposals for meaningful improvements to the A3 around Guildford. At present one may be stuck in heavy traffic for 45 minutes on a daily basis, as one covers no more than 2 miles travelling Westwards. A tunnel might help but is there any realistic prospect of that being completed in the Plan period?

**Roads**: There are no proposals to widen or improve the surface of poor roads in and around Guildford. Many roads cannot be widened, therefore the increased traffic from the planned 12,426 new houses (approximately 24,000 extra cars) will cause grid-locks and serious congestion, within the town and in the small rural roads in and around villages.

**Surgeries**: There are no proposals for new surgeries in most of the areas GBC proposes to develop.

At present, most surgeries are managing at the limit of their capabilities. Many surgeries have no room to expand, even if they could find sufficient doctors, nor to expand their car-parks.

**Schools**: Most schools are at full capacity. Not enough new schools have been proposed.

**Water and sewage**: Many of the sites proposed will have difficulty in bringing in sufficient water supplies. New sewage farms would need to be built at most of the sites. At Wisley, proposals suggest that the Ripley sewage works could accommodate the waste from an extra 2000 houses. **It cannot.**

**Trains**: a new station at Burpham is a good idea. It might take the pressure off Horsley and Effingham.

**Buses**: Suggestions by the Wisley developers that buses might run every 10 minutes to Woking station are ludicrous. It is also unrealistic to run buses to Effingham as the road is too narrow and unsafe.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/527  **Respondent:** 15584033 / Andrew Hutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt**

This issue causes the most anger.

I object to the statement in the Draft Local Plan under GreenBelt Policy P2 (4.3.13) which claims that West Horsley and a further list of 13 villages are “now inset from the Green Belt”.

This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain, as instructed, under the NPPF regulations, in the Green Belt!
The Conservative Party manifesto 2017 states “It means maintaining the existing strong protection on designated land, like the Green Belt…”

Government statements in the Housing White Paper 7 Feb 2017, claim that existing protection for the Green Belt would remain unchanged and emphasised that authorities should amend Green Belt boundaries only when they had examined fully all other reasonable options for meeting their identified development requirements.

GBC has failed to propose sufficient brownfield sites and has gone ahead with Green Belt development proposals against all reason and opposition. GBC has allowed a “Pop-up village” of ugly portacabin retail shops, which was a total failure at Christmas, to be re-instated on a site, eminently suitable for development close to the town centre. They also allowed Waitrose to waste another town centre site to use as a car-park, rather than building one below ground with flats above. Their intention, as suggested in every version of the draft Local Plan, is to over-develop small villages, place large developments on sensitive sites and ignore the brownfield opportunities.

I object to ANY villages being “inset” from the Green Belt.

I object to any major development being encouraged on farmland, open spaces or obtrusive sites.

Blackwell Farm should not be developed at all. There are many reasons for this including archaeology and wild-life, but I mainly object because houses on the slopes of the Hogs Back would be a blot on the landscape. A roundabout on the A31, leading to the site, with its associated street lighting would be visible and intrusive for at least 20 miles to the North and South.

I object to the proposals for over 2000 houses at Wisley. Several applications for this development have been turned down but the GBC Executive refuses to listen to any objection and seems determined to go ahead with this development, even after all the Councillors rejected the last application. The site was returned to the Draft Local Plan within days of this decision. Five storey flats would be an eyesore from all points of the Downs. The site is very visible as it is on a dome of land. At present, the airstrip, which should have been removed after its war-time requisitioning, is not visible among the green fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3017  Respondent: 15584065 / Amy Gervasio  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 lack of facilities in Send/Ripley to cope with the extra people who come and live here. The doctors and schools are already bursting and cannot take any more residents.

I OBJECT to the lack of thought put into the road infrastructure to accommodate all the development suggested: Send has one road winding through it which then snakes through flood plane into Old Woking. These roads are already too busy. The amount of cars resulting from the developments around Send/Ripley will just overload these roads. The traffic will be unbearable and the pollution from stationary and slow-moving vehicles will cause a health hazard to local residents.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPS16/6097  Respondent: 15584065 / Amy Gervasio  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the houses proposed at Clockbarn Nursery because the lane there just will not cope with that sort of traffic! It is too narrow and twisty. The junction with the main road through Send is already overloaded and cannot take the added amount of traffic resulting from possibly an extra 90 to 100 cars generated by 45 houses!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPS16/6096  Respondent: 15584065 / Amy Gervasio  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 400 houses and 7000 sq m of industrial space at Garlick’s Arch. This field floods regularly so is not suitable for purpose. Also, there is no need for this huge industrial space to be built on this site when there’s a brownfield site up the road in Slyfield that can take any of this sort of development. It will just ruin this land and bring in loads of traffic and pollution.

I OBJECT to the fact that Garlick’s Arch and Gosden Hill are in green belt land and therefore should not be used for building whatever because safeguarding the green belt stops developers from creating urban sprawls and this is what we will get if these sites are developed. Nowhere will be safe from development if the council keeps changing the boundaries of the green belt to suit their purposes.

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 environmental damage that will occur to the Ancient Woodland at Garlick’s Arch if the development goes ahead, particularly if the industrial site is allowed. These trees protect against pollution and should not be threatened. Generally the poor air quality resulting from all the extra, congested traffic will damage village life generally.</td>
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<td>I OBJECT to the new interchange with the A3 at Burnt Common. I have already pointed out that the main road through Send is insufficient for the amount of traffic planned in Send alone. If the interchange of the A3 goes ahead then the amount of traffic coming from the Wisley Airfield, Gosden Hill and Blackwell Farm planned developments along with the Send developments means that Clandon, Burnt Common and Send will be completely overloaded and the congestion will become unbearable!</td>
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</table>
I OBJECT to the planned development for houses and two travellers’ pitches on Send Hill. The land here has unsafe landfill waste registered with Guildford Borough Council so shouldn’t be built on! Also the lanes leading to it are too narrow for extra traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12544  Respondent: 15584065 / Amy Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 amount of development that is happening in the Send/Ripley/Wisley/Burpham areas and doubt that this amount of development is actually needed. The SHMA report now states that there is massive demand for new housing, double the amount quoted in previous plans, but the Council will not publish the report so how do we know if this figure is accurate or overstated?!

I OBJECT to the wider borough plan – there’s too much development in the north-east of the borough (Wisley, Ripley/Send/Clandon). A third of the whole Local Plan’s new housing is in this area which only has a tenth of the existing housing. It is unbalanced and will ruin the feel of the villages which will become merged in a long sprawl of development along the A3 from the M25.

I want these objections to be presented to the Planning Inspector. Please send me confirmation that you have received this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6103  Respondent: 15584097 / George Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object specifically to the proposed Clockbarn Nursery development in Send. Tannery Lane is not wide enough or straight enough to allow the amount of traffic generated by 45 houses. The junction of Tannery Lane, Sandy Lane with Send Road is a nightmare now. This amount of development will make it impossible and Tannery Lane cannot be widened at this junction as there is housing on either side.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6104  Respondent: 15584097 / George Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the development at Garlick’s Arch because it is on Green Belt land. There are no exceptional circumstances which allow for the removal of this land from the Green Belt. There is perfectly good brownfield land at Burnt Common just up the road from Garlick’s Arch which can accommodate houses and has the infrastructure for industrial units already and yet, at the 11th hour, this was removed from the Local Plan and replaced by Garlick’s Arch without proper public consultation. National Planning Policy argues sustainable developments must have sustainable transport. With bus services barely adequate at present and no train station within reasonable walking distance, it is impossible to state that Garlick’s Arch has a sustainable transport solution.

- I object to the development at Garlick’s Arch because it is an area identified as having a high risk of flooding by the Environment Agency. The British weather does not seem to be improving and with ever increasing rainfall comes the potential for flooding especially with the stream that crosses this site. If this land is built on, there will be less porous ground to soak up the extra rainfall. This will result in increased flooding and mayhem for new and old residents alike.

- I object to the damage to ancient woodland and wildlife at Garlick’s Arch. Various trees bordering the development are protected by Tree Preservation Orders. The site is abundant with wildlife, some of which is protected. It is home to many types of owls and bats as well as having cuckoos and woodpeckers, not to mention badgers, deer and red kites. This development will result in a loss of this habitat and no wildlife report has been conducted to see the damage building will cause to it.

- I object to the resulting deterioration of air quality because of the Plan. The amount of housing proposed, particularly in the north east of the borough, will result in many more cars on the road and lorries driving into the proposed industrial site at Garlick’s Arch. This is bound to cause significant rises in diesel pollution which will have an adverse effect on the health of locals. I am asthmatic and don’t want to have to breathe in these fumes on a daily basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6105  Respondent: 15584097 / George Gervasio  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 four-way junction on the A3 proposed at Burnt Common. On the face of it, a four way junction at Burnt Common is something I would have approved of but not at the expense of this massive over development. The development across the north east of Guildford at Wisley Airfield, Send and Gosden Hill will mean high levels of traffic that small villages really shouldn’t expect to have to cope with. The main road through Clandon, Burnt Common and Send is unfit for purpose. There are places along them where heavy goods vehicles cannot pass each other and there is no prospect (or plan) to widen the roads as houses line both sides of them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6106  Respondent: 15584097 / George Gervasio  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 planned development sites at Send Hill. The building of 40 houses and two travellers’ pitches at Send Hill should not be allowed to go ahead because this land contains documented unsafe land fill waste in it. Additionally, the roads in this area are single track and too narrow to provide sufficient access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12553  Respondent: 15584097 / George Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to the congestion that the development will cause to local village roads and the lack of road infrastructure in the Local Plan. The local roads in the centre of Ripley and Send are completely overloaded as it is. The proposed development will cause even greater congestion and this Plan does not provide provision for improving the roads. Side roads are single or narrow track, poor quality with no pavements so are not suitable for increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12552 Respondent: 15584097 / George Gervasio Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the congestion that the development will cause to local village roads and the lack of road infrastructure in the Local Plan. The local roads in the centre of Ripley and Send are completely overloaded as it is. The proposed development will cause even greater congestion and this Plan does not provide provision for improving the roads. Side roads are single or narrow track, poor quality with no pavements so are not suitable for increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12554 Respondent: 15584097 / George Gervasio Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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 development planned in the north east of the borough. It is impossible to know whether or not the proposed amount of housing need is correct, as the SHMA report has been withheld from public view by the GBC. Surely this course of action by the GBC is underhand, if not unlawful? Perhaps we do need 600 + houses a year, twice the amount quoted in previous plans, but without the proof, we cannot be sure and this leaves a bad taste in the mouth!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3023 Respondent: 15584161 / Alexandra Elson 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:

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Comment ID: PSLPA16/3024  Respondent: 15584161 / Alexandra Elson  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: PSLPS16/6110  Respondent: 15584161 / Alexandra Elson  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
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: PSLPS16/6112  Respondent: 15584161 / Alexandra Elson  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 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 an inappropriate 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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Comment ID: PSLPP16/12561  Respondent: 15584161 / Alexandra Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12569  Respondent: 15584161 / Alexandra Elson  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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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:**

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**Comment ID:** PSLPP16/12558  **Respondent:** 15584161 / Alexandra Elson  **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:** PSLPP16/12564  **Respondent:** 15584161 / Alexandra Elson  **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 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 likely 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 the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12568  Respondent: 15584161 / Alexandra Elson  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: PSLPP16/12566  Respondent: 15584161 / Alexandra Elson  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: PSLPP16/12567 | Respondent: 15584161 / Alexandra Elson | Agent: |

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID:  PSLPP16/12571</th>
<th>Respondent:  15584161 / Alexandra Elson</th>
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<td>Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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:** PSLPP16/12563  **Respondent:** 15584161 / Alexandra Elson  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)  

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.  

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.  

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.  

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.  

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.  

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.  

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.  

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.  

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.  

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside
the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based
on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to
court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-
viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns
over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if
at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been
identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing
residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers.
No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical
Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and
suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing
health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will
stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12565  Respondent: 15584161 / Alexandra Elson  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 all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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.

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:** PSLPP16/18645  **Respondent:** 15584161 / Alexandra Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12555  Respondent: 15584161 / Alexandra Elson  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: PSLPP16/12556 | Respondent: 15584161 / Alexandra Elson | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with 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 do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.
The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable
development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and
surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand.
The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in
the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up
areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the
borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill
Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing
being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent
only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being
allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of
identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing
across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and
relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are
based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local
population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest
unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set.
Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is
set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken
into account.
The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1490  **Respondent:** 15584161 / Alexandra Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1491  **Respondent:** 15584161 / Alexandra Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound, because, but not limited to, the following reasons:

1. **“Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.”** Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
1. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
2. 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.
3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an 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.
2. 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.
3. 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:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1492</th>
<th>Respondent:</th>
<th>15584161 / Alexandra Elson</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
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<td>(No)</td>
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</table>

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:**

<table>
<thead>
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<th>Comment ID:</th>
<th>PSLPA16/3030</th>
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<td>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 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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<td>( ), 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 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:**

<table>
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<th>Comment ID:</th>
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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 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:

Comment ID: PSLPS16/6117  Respondent: 15584481 / Jeremy Hamilton  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 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: PSLPS16/6116  Respondent: 15584481 / Jeremy Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</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 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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<th>Comment ID: PSLPP16/12588</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

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: PSLPP16/12597  Respondent: 15584481 / Jeremy Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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: PSLPP16/12598  Respondent: 15584481 / Jeremy Hamilton  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:

Comment ID: PSLPP16/12595  Respondent: 15584481 / Jeremy Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12586  Respondent: 15584481 / Jeremy Hamilton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/12590  Respondent: 15584481 / Jeremy Hamilton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12584  Respondent: 15584481 / Jeremy Hamilton  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: PSLPP16/12591  Respondent: 15584481 / Jeremy Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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: PSLPA16/3028  Respondent: 15584513 / Transport for London (Richard Carr)  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): ()
TfL is working to implement the recommendations of the National Infrastructure Commission relating to the delivery of growth associated with Crossrail 2. From a strategic transport perspective, Crossrail 2 would release capacity on rail corridors that are used by trains to/from Guildford and thereby help to support future development within the borough, although Crossrail 2 would not directly serve any stations within Guildford. Explicit support for Crossrail 2 and a recognition of its important contribution to delivering future growth as set out in the Local Plan would be welcomed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp17q/667  **Respondent:** 15584513 / Transport for London (Richard Carr)  **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):** ( )

There is an acknowledgement of the important role of Crossrail 2 in the supporting transport topic paper and transport evidence base although this has not been explicitly recognised in the Local Plan strategy. Inclusion of Crossrail 2 in the transport topic paper and transport evidence base is welcomed. However, the explanatory text in section 5.25 on rail schemes needs to be updated as follows:

Options are set out, including the Crossrail 2 scheme, which in combination would remove the capacity constraint on the South West Main Line between Surbiton and Waterloo and allow for an additional 13 trains per hour peak services forecast to be required by 2043. The Government and TfL have subsequently announced funding for the development of Crossrail 2 which is expected to be operational in 2033. Schemes to provide grade separation at Woking Junction and an additional through platform at Woking station will also be required.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3713  **Respondent:** 15584641 / Miriam Gilkerson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
- I object to the lack of any evidence for the alleged housing need numbers in this specific locale

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7049</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to site A25 Gosden Hill Farm. A large 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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Do you consider this section of the document; complies 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 inappropriate in the Green Belt, and unsustainable re facilities and traffic

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? ( )
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 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: PSLPS16/7045  Respondent: 15584641 / Miriam Gilkerson  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): ()

- As a resident within very close proximity to Garlicks Arch (we live in Burnt Common Close) I object to the late inclusion of the proposed development (site A43 Garlicks Arch)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6124  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to site A43a - the on/off ramp at Burnt Common. Traffic is already significant, and this will significantly increase the jams through Send, Ripley and Clandon

**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 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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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to site A57 The Paddocks - 4 traveller pitches

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12622  Respondent: 15584641 / Miriam Gilkerson  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: PSLPP16/12619  Respondent: 15584641 / Miriam Gilkerson  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?
Comment ID: PSLPP16/12624  Respondent: 15584641 / Miriam Gilkerson  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?

Comment ID: PSLPP16/12625  Respondent: 15584641 / Miriam Gilkerson  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?

Comment ID: PSLPP16/12623  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12618  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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)

In your 'About Guildford' publication you specifically mention not removing areas from the green belt and yet this is exactly what you are planning.

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: PSLPP16/15664  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to any ‘in-setting’ that removes villages from the Green Belt

As a resident of 40+ years, growing up in Wisley and now raising my family in Burnt Common, I have greatly appreciated the beauty and quality of life being in the Green Belt affords. It is deeply disappointing that those that should be seeking to protect village life and respecting the Green Belt believe that adding huge numbers of houses and traffic will help. I therefore object wholeheartedly to this local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12620  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12617  Respondent: 15584641 / Miriam Gilkerson  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: PSLPP16/15662   Respondent: 15584641 / Miriam Gilkerson   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 I do not believe the proposed development (policy S1) is sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/12621   Respondent: 15584641 / Miriam Gilkerson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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: PSLPP16/15663   Respondent: 15584641 / Miriam Gilkerson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with 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 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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<th>Comment ID: PSLPA16/3043</th>
<th>Respondent: 15584833 / Maria Fort</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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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: PSLPS16/6138  Respondent: 15584833 / Maria Fort  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:

Comment ID: PSLPS16/6139  Respondent: 15584833 / Maria Fort  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: PSLPP16/12637  Respondent: 15584833 / Maria Fort  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: PSLPP16/12638  Respondent: 15584833 / Maria Fort  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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<th>Comment ID: PSLPP16/18582</th>
<th>Respondent: 15584833 / Maria Fort</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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:

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<th>Comment ID: PSLPP16/12647</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12640  Respondent: 15584833 / Maria Fort  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, 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. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the
villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12644  Respondent: 15584833 / Maria Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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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. 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?

Comment ID: PSLPP16/12636  Respondent: 15584833 / Maria Fort  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 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 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 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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<th>Respondent:</th>
<th>15584833 / Maria Fort</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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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 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 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:
"We object"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12643  Respondent: 15584897 / J Street  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6137  Respondent: 15584929 / Ann-Marie Le Souchu  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”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3046  Respondent: 15584961 / Helen Meredith  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): ()

APPENDIXC

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: PSLPA16/3047  Respondent: 15584961 / Helen Meredith  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): ()

18. APPENDIXD

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough which I believe is excessive (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too
• 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
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct 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, which has doubled 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. 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: PSLPA16/3045  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other 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 tens of thousands of detailed comments the Council has received about individual sites since the Issues and Options consultation in 2013.

2. The housing needs assessment is flawed in various respects and overstates housing In addition since it was produced, the 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 should be reconsidered.

3. Having determined housing need the Council was should have considered constraints before determining the housing number including the scarcity of sites outside the Green Belt and infrastructure (particularly roads).

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. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the exceptional circumstances 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6144  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25- Gosden Hill Farm

I object to Policy A25 with proposals for Gosden Hill Farm. The Green Belt serves the important function of separating West Clandon from the edge of urban Guildford and Gosden Hill Farm currently provides a green buffer and gives Burpham a defined green boundary. The Plan fails to provide any evidence that any exceptional circumstances exist to justify removing this site from the Green Belt and therefore it does not comply with paragraphs 87-89 of the NPPF. 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. The scale of development proposed at Gosden Hill is out of proportion to West Clandon being four times the size of the existing village. 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.

I strongly object to the proposal for a 4 way junction at Burnt Common. 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. This junction would have 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. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow roads through West Clandon, Send and Ripley. The additional traffic will also greatly increase air pollution which is particularly critical given the proposal to build two schools.

If the Strategic Sites are developed, the north of Guildford will deliver 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6145   Respondent: 15584961 / Helen Meredith   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 AND A43a – Garlick’s Arch

I object to Policy A43 and A43a in relation to plans for Garlick’s Arch. This site was only inserted into the draft plan at a late stage just before publication of the consultation draft. The site is not a sustainable site being far from infrastructure facilities and transport links. 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. There is no evidence in the plan of the exceptional circumstances required 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. The development will cause harm to the ancient woodland by which the site is bordered -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)

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.

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.

The stated preference in the Plan is to make best use of previously developed land. Nonetheless 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.

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).

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 draw in a huge amount of ‘through’ traffic as the route from London/M25 to Woking would be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 would 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 impact which the proposed local plan will have on special countryside. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland which includes over 80 ancient oak trees that surrounds and runs through the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12665  Respondent: 15584961 / Helen Meredith  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 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: PSLPP16/12653  Respondent: 15584961 / Helen Meredith  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) and to the inclusion of a strategic employment sites at Gosden Hill Farm and Garlick’s Arch (A43). Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption.

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 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: PSLPP16/12655  Respondent: 15584961 / Helen Meredith  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) as 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12656  Respondent: 15584961 / Helen Meredith  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. However 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: PSLPP16/12668  Respondent: 15584961 / Helen Meredith  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. The policy should recognise that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, such as at Newlands Corner. 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.
2. To improve Guildford’s river
3. To help private providers market local tourism for example helping to co-ordinate tourism packages under a distinctive.

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: PSLPP16/12664  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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1. POLICY E7

I object to Policy E7 Guildford Town Centre

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 and should encourage a wider variety of small businesses and shops.

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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1. POLICY H1

I object to Policy H1 – Homes for all. The policy says that the Council will encourage building over the plan period. It fails to set rules on 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. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking. The University of Surrey 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 therefore not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the University's ability to house its own students and reduce the housing number accordingly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12667  Respondent: 15584961 / Helen Meredith  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 which will be allowed to 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 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) still applies to these cases, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and makes a mockery of all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for all developments however inappropriate and unsuitable. The wording prevents balancing the desirability of the development against other considerations including harm to the Green Belt or the AONB. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should define “small” and 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 wording of the policy should also be changed to require the local connection requirement for tenants to be secured in perpetuity.

The 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: PSLPP16/12659  Respondent: 15584961 / Helen 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): ()

1. POLICY I1

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) Many 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. 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 with road surfaces are in a very poor condition. The proposed development under the plan will cause greater congestion in and around many villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. 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 and neighbouring villages will become even more congested. Every week thousands of cyclists pass through these villages following the promotion of the area in the 2012 Olympic cycle road trials. The narrow rural roads do not have cycle lanes or even proper pedestrian footpaths. In West Clandon much of the length of The Street has a narrow footpath on only one side of the road making it very dangerous, especially when vehicles mount the pavements. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians and cyclists.

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. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income instead of recognising this as a key constraint.

It is highly likely that developers faced with large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development unviable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I am concerned about the lack of planning for infrastructure requirements and whether 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 as utilities and services, such as the electrical
network, sewers, Doctors’ Practice and Police, in the Ripley and Send area are at, or very close to capacity. The lack of plans to improve these services should be bar to development of the Garlick’s Arch site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12660  Respondent: 15584961 / Helen Meredith  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. POLICYI2

I object to this policy as it fails to address the congestion that development will cause to the trunk roads- the A3/M25 (Policy I2). The draft plan commits to building massive housing estates in the countryside before any road improvements are in place. This is inappropriate and will lead to traffic disruption during the construction phase and will add permanently to an already congested network. 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 the A3 or M25 will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans even to examine improving the A3 before 2020. I am therefore extremely concerned 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 make the situation far worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12661  Respondent: 15584961 / Helen Meredith  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. This will 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: PSLPP16/12650  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I object to this Policy on the grounds that this is 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. In addition other changes within the plan, such as the change to the village settlement area within West Clandon and other villages will result in other pieces of Green Belt land (such as land at Barn End, The Street, West Clandon) being developed for housing in addition to the sites allocated within the proposed plan.

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 commissioned by Guildford Borough Council was a simplistic tick box exercise. It failed to 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 sites proposed to be removed from the
Green Belt should be carefully assessed against any exceptional circumstances in deciding whether they 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’ nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

I 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 believe that the consultation process was flawed and ineffective because of this.

I object extremely strongly to the “insetting” of 14 villages from the Green Belt. These villages contribute to the openness of the Green Belt and there is no need to inset them. 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 village settlement boundary extensions go ahead.

I object extremely strongly to the wholesale extension to the settlement boundaries in many villages which is a change made since the 2014 version of the Plan and in relation to which there has been no consultation. This change will allow infilling in the Green Belt. 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. For example, Guildford Borough Planning Department are already well aware of multiple previous applications for planning permission for a large number of houses made by Philip Christian of Stonehaven homes on a 5 acre strip of Green Belt at Barn End, The Street, West Clandon. Careful examination of the village settlement area of West Clandon shows that the existing West Clandon village settlement area had been very carefully drawn around the boundaries of this piece of Green Belt so as to protect this from development. The land is of environmental significance as this provides a green wildlife corridor adjacent to protected woodland. In the past every application has been refused locally and the decisions have been upheld on Appeal but that position will be impossible to sustain if this land is included in the proposed new settlement boundary for West Clandon I live next to this piece of land and have seen Surveyors working on the site in the last week presumably preparing an application for planning permission to develop the site wholesale if the draft Local Plan comes into force.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as it is factually incorrect.

In addition I object to the proposals to remove from the Green Belt Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. 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.

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: PSLPP16/12651  Respondent: 15584961 / Helen Meredith  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 P2**

I object to this Policy on the grounds that this is 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. In addition other changes within the plan, such as the change to the village settlement area within West Clandon and other villages will result in other pieces of Green Belt land (such as land at Barn End, The Street, West Clandon) being developed for housing in addition to the sites allocated within the proposed plan.

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 commissioned by Guildford Borough Council was a simplistic tick box exercise. It failed to 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 sites proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether they 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’ nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

I 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 believe that the consultation process was flawed and ineffective because of this.

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Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and village settlement boundary extensions go ahead.

I object extremely strongly to the wholesale extension to the settlement boundaries in many villages which is a change made since the 2014 version of the Plan and in relation to which there has been no consultation. This change will allow infilling in the Green Belt. 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. For example, Guildford Borough Planning Department are already well aware of multiple previous applications for planning permission for a large number of houses made by Philip Christian of Stonehaven homes on a 5 acre strip of Green Belt at Barn End, The Street, West Clandon. Careful examination of the village settlement area of West Clandon shows that the existing West Clandon village settlement area had been very carefully drawn around the boundaries of this piece of Green Belt so as to protect this from development. The land is of environmental significance as this provides a green wildlife corridor adjacent to protected woodland. In the past every application has been refused locally and the decisions have been upheld on Appeal but that position will be impossible to sustain if this land is included in the proposed new settlement boundary for West Clandon I live next to this piece of land and have seen Surveyors working on the site in the last week presumably preparing an application for planning permission to develop the site wholesale if the draft Local Plan comes into force.

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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: PSLPP16/12648  Respondent: 15584961 / Helen Meredith  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 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.” Policy S1 ought to set a clear framework. Instead, there is no definition of “sustainable development”. The policy 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.

Guildford Borough Planning Department are already well aware of multiple previous applications for planning permission for a large number of houses made by Philip Christian of Stonehaven homes on a 5 acre strip of Green Belt at Barn End, The Street, West Clandon. The land is of environmental significance as this provides a green wildlife corridor adjacent to protected woodland. In the past every application has been refused locally and on Appeal but that position will be much harder to sustain under the proposed Policy S1. I have seen Surveyors on the site in the last week presumably carrying out the planning work for the next planning application by Mr Christian for submission if this Local Plan comes into force.

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 utility services in these villages will not be able 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 from the point of view of access to public transport links with local bus services at best infrequent (with 2 hour gaps between buses) and local bus services are constantly reducing. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will have few options, but to be reliant on cars. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options already exist.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion and frequent accidents on the Street due to the narrow width of the road at several pinch points. Further vehicle movements will result in
even more acute congestion, greater pollution and likely increase in accidents. 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>Comment ID:</th>
<th>PSLPP16/12649</th>
<th>Respondent:</th>
<th>15584961 / Helen Meredith</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I object to the Borough Wide Strategy (Policy S2 as this 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 significantly.

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. Guildford is in the London commuter belt and part of a far wider and more complex housing market. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise

The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial as 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. 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.

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. The Plan also ignores the fact that many of those working in the area live elsewhere, as my husband who runs an accountancy practice in Guildford Town Centre knows first-hand. 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 been deliberately 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 strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocations of 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. This is completely unbalanced and does not reflect the current spread of housing across the borough. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, and checking the unrestricted sprawl of large built up areas and preventing neighbouring towns from merging into one another.

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 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 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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**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 upon which it is claimed to be based. The 2014 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. Despite these responses, the 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I do not consider the Proposed Submission Local Plan: strategy and sites “as a whole” to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green ” 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 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 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 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 and there is no indication that Network Rail has any intention whatsoever of building a station at this
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
16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation
17. The proposal to change village settlement boundaries was added to the draft Local Plan without any prior
18. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer 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.
19. 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
20. 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.
21. 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.

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
2. Cast iron commitments should be included in the plan that development can only commence when required infrastructure improvements, including commitment from Network Rail to build a new station at Merrow, have been
3. The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1503</th>
<th>Respondent: 15584961 / Helen Meredith</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</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 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.

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: PSLPS16/6142  Respondent: 15584993 / Jan Lofthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The absence of any exceptional circumstances justifying removal of the site from the Green Belt. The only justification for releasing the site is said to be the shortfall in available sites to meet the housing needs of the Borough. However the Council’s own evidence base demonstrates that the release of this site is not, in fact, required in order to meet the housing need. Thus:

1. Draft policy S2 states that 13,860 new dwellings will be provided over the Plan period in order to meet the identified housing need, based on a FOAN of 693 dpa (693 x 20 years = 13,860).
2. However the LAA advises that, not including sites with planning permission, sufficient land is already available to construct 13,708 new dwellings over the next 15 years i.e. up to 2031 (with any development from 2031-2033 to be added to this total).
3. There are 1,342 homes with planning permission which are expected to deliver new homes within the next five years, as well as 66 homes in the 11-15 year period.
4. Accordingly, there is already provision for a total of 15,116 new homes, even without taking into account completions for 2013-2014 (132), 2014-2015 (242) and 2015-Feb 2016.

Even on the Council’s own analysis, there is therefore a significant surplus of available land compared to the identified housing need, and this surplus has previously been acknowledged by the Leader of the Council. Consequently, the housing need cannot amount to exceptional circumstances justifying the release of this site. Moreover, as noted above, the expert advice received by WAG is that the FOAN of 693 dpa is far too high and that the correct figure is in fact 510 dpa, or 10,200 dwellings over the plan period. On this analysis the available land far exceeds the identified housing need.

G B C Has plenty of land to use in the Borough to develop on, without touching the Green Belt. Please leave Green Belt Land alone. Once it is gone, it is gone FOREVER
Please use your brown field and derelict sites and alter your SHMA figures and you need never touch green belt land.

SIMPLES!

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>PSLPS16/6141</th>
<th>Respondent: 15584993</th>
<th>Jan Lofthouse</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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OBJECTION TO DRAFT LOCAL PLAN

I object to the G B C Draft Local Plan as follows:-

The inclusion of Green Belt Land for proposed development as strategic sites, particularly Three Farm Meadows Wisley, the Former Wisley Airfield because fo the following

NO EXCEPTIONAL CIRCUMSTANCES FOR BUILDING ON THE GREEN BELT
FORMER WISLEY AIRFIELD NOW T F M

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>PSLPS16/6143</th>
<th>Respondent: 15585057</th>
<th>Alison Warwick</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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I object to Send, Ripley and Burnt Common proposed developments.

I object to policy a44 land west of Winds Ridge and Send Hill for 40 homes and 2 travellers pitches. This local amenity is well used by the local community and is also an old landfill site. It has green belt status and a beautiful area of countryside would be spoil by any development. Any disturbance of this old landfill site is potentially dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPP16/12672 **Respondent:** 15585057 / Alison Warwick **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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 i.e 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:** PSLPP16/12685 **Respondent:** 15585121 / Dave Cress **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; 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.

No exceptional circumstances to allow Unneccessary Development have been shown by Borough Council to warrant the 2000houses and traveller sites being built on Gosden Hill Farm.This Green Belt land should be saved, the A3 4 way junction and possible tunnel entrance should be decided first.

It is unsound for many reasons stated by the GRA response. The too high figures from SHMA must be reduced to Waverley and Woking councils reductions levels AT LEAST.Guildfords report on housing figures is UNSOUND.

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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3052</th>
<th>Respondent: 15585153 / Robert Batterbury</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<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>

Dear Sir/Madam,

I STRONGLY OBJECT to the Guildford Local Plan Proposal.

I am a resident of West Horsley and I OBJECT to the local area being removed from the Green Belt zone, and the consequent residential homes and estates being built.

I am a new resident to West Horsley, after my family paid a premium to move to a beautiful semi-rural environment surrounded by natural scenery. I have just moved from an already overdeveloped and high density area. I have witnessed the pressures that overpopulated areas cause, such as increased:

- CRIME
- TRAFFIC
- POLLUTION (Increased CO2 emissions, light pollution)
- OVERCROWDED PUBLIC TRANSPORT
- INSUFFICIENT PARKING IN THE VILLAGE

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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6150</th>
<th>Respondent: 15585217 / Christine King</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), 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>
Re: Proposed GBC Local Plan Normandy and Flexford Site A46

I would like to object to the proposed plan for a number of reasons.

1. I do not feel that the need for another secondary school has been proven. The secondary schools in Guildford and Ash have many spaces available currently. If the intention is that the proposed new houses should provide the students, it is unrealistic to assume that there will be sufficient numbers in convenient age groups to attend such a school. If the intention is to ‘bus’ students in from either Ash or Guildford area, I have to wonder if any councillor has been on either the A31 or the A323 (mostly 30mph) during the morning and evening? The roads are frequently at a standstill and in the case of the A323 in a dangerous position, particularly due to the number of primary schools on the route. I find it unbelievable that the already over-burdened infrastructure should be put to more strain.

2. The land is Green Belt, and I do not believe that any ‘special circumstances’ have been proved. There are plenty of already suburban areas which could have smaller developments which would not have the appalling potential of such a large scale plan on a rural site. This area is an oasis between the Guildford and Aldershot/Farnborough developments and unsuitable for such a large scale plan.

3. The area is below the slopes of the Hogs Back and already has the potential for flooding. Run off from the hills is frequent and well known. Have the council learned nothing from the flooding locally? Has the council learned nothing from the warnings about building on land which forms a natural drain?

4. Is there a proper, considered study of the effect of such a large scale development on local flora and fauna? Green Surrey is gradually disappearing as gardens are tarmac-ed over and shopping centres encourage out of town traffic and parking. How can using agricultural land in this small village be actively considered when there are brown field sites available?

Why has the council considered massive developments which have the potential for immense impact on infrastructure, environment and community, rather than smaller developments in brown field sites, infilling and town outskirts? A cynical person may believe it is for ease of administration....Please take note of the community and properly represent the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2417  Respondent: 15585217 / Christine King  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you to support the removal of Sites A46 and A47 from the Plan. It is essential that the already congested, narrow roads are not required to take more traffic, as already happens during the frequent issues on the Hogs back and A3 into Guildford. Flooding already occurs on these roads, and on the fields in the lee of the Hogs Back and its steep slopes Wastewater, sewage and other services cannot cope with a development of the size originally suggested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/810  Respondent: 15585217 / Christine King  Agent:
The Green Belt also provides a 'fire barrier' at the northern end of Glaziers lane and the hamlet of Flexford to avoid further urbanisation of these habitat-rich and open areas between towns already encroaching.

I hope that GBC will liaise with other councils to ensure that the issues do not merely move a few miles to a different location along this corridor. Rural communities already have to jostle amongst the competing demands of housing, healthcare and traffic. The Blackwater Relief Road may have relieved the Blackwater Valley but the knock-on effect along the Tongham/Ash/Normandy areas must be taken in to consideration.

Thank you for your considerations so far. This area really plays an important role.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3058  **Respondent:** 15585249 / Joe Eke  **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 proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3060  **Respondent:** 15585249 / Joe Eke  **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 impact on the greenbelt status of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6154  Respondent: 15585249 / Joe Eke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to the proposed development of Gosden Hill Farm (Policy A25) and its inevitable impact on the roads around Send. Despite assurances of an additional railway station, commuters will utilise the opportunity to leave the A3 at the existing Burnt Common roundabout and travel on the faster Woking to Waterloo line, rather than use the slower Guildford line.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

- I OBJECT to the proposed development Clockbarn Nursery (policy A42) due to the impact that the additional traffic will have on small local roads. Send Road is already frequently blocked by HGVs trying to turn into Tannery Lane; this can only be made worse by additional traffic using the same road.

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 A43a (Land for North facing slip roads to/from A3 at send Marsh/Burnt Common). This would necessitate a 4-way junction at Burnt Common and would inevitably increase the amount of traffic using the local roads in Send. This junction would worsen the problem of drivers using Send as a cut through from Guildford to Woking on local roads that are just not intended for this purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6157  Respondent: 15585249 / Joe Eke  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 site is not large enough for the proposed use.
- The siting of two travellers pitches in Send Hill will be detrimental to both Send Hill and the Send/Ripley areas with house values and people’s desire to move into the area adversely affected.
- 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.
- Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status and would be spoilt by development.
- The existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.
- Too many houses are proposed to Send/Send Marsh are and the impact on traffic congestion and local services would be unacceptable.
- 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.
- This would cause loss of village identity, be detrimental to the community and increased flood risk.
- 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 properties.
- GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.
- Both the Envirossearch 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 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. It also identifies proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes concern as to what it does contain and dangers if disturbed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12696</th>
<th>Respondent: 15585249 / Joe Eke</th>
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<td><img src="https://example.com/image3" alt="Image" /></td>
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</table>

- I OBJECT to the impact on the infrastructure around the villages. The roads around Send and Ripley are already congested and cannot cope with the current needs. The Local Plan does not incorporate a detailed transport infrastructure strategy that would demonstrate how the road network would support the additional pressure on the roads and other amenities if the proposed development went ahead.

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 S2</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 OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000 and if it goes ahead Send and Ripley will become a conurbation of Woking and Guildford.

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: PSLPS16/6151</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): ()

In particular I object to the late inclusion of site A43 Garlicks Arch. This is a green field site with productive agricultural land and ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6152  Respondent: 15585281 / Val Woodland  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 support in principle the idea of a new junction with access to and from the A3 in both directions somewhere between Burpham and Burnt Common, however a better place for this is nearer to site A25 Gosden Hill Farm, using both sides of the Portsmouth Road dual carriageway to access the new junction from Burnt Common roundabout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12694  Respondent: 15585281 / Val Woodland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with 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 on greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12693  Respondent: 15585281 / Val Woodland  Agent:
I object to the local plan as the development proposed is not sustainable (Policy S1). The number of houses to be built per year is too high. The building should only be started when the infrastructure needed to serve the future residents is in place. The local schools and surgery are at full capacity already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3664  
Respondent: 15585281 / Val Woodland  
Agent:

I object to policy A43 change at Garlick's Arch because

*it is on permanent Green Belt land,
*there are no exceptional circumstances,
*it would join Send and Ripley, which defeats the purpose of Green Belt,
*it is on ancient woodland

I also object to Policy A58 at Burnt Common because

* it is in the middle of Green Belt
*Slyfield and Guildford industrial areas still have empty units
*the 2017 Employment Land Need Assesessment shows a reduction in demand for industrial land
*there will be a severe impact on local traffic

There is no need for large quantities of new, expensive housing in Send for wealthy people who will then perpetuate the 'not in my backyard' approach to further new housing.

I do, however, think there is a major need for affordable housing in Send, but I see no need for it to be on Green Belt or ancient woodland.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6163  Respondent: 15585313 / Kim Styles  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 Farm A25 overdevelopment in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6161  Respondent: 15585313 / Kim Styles  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 Airfield A35 in appropriate development in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7099  Respondent: 15585313 / Kim Styles  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 – Wisley Airfield A35 inappropriate development in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6159  Respondent: 15585313 / Kim Styles  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 late inclusion of Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7096  Respondent: 15585313 / Kim Styles  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 late inclusion of Garlicks Arch Site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7097  Respondent: 15585313 / Kim Styles  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 On and Off ramp at Burnt Common/Clandon Site A43a – this will only increase existing traffic problems in the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6160  Respondent: 15585313 / Kim Styles  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 A45 overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7098  Respondent: 15585313 / Kim Styles  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 Site A45. This is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7100  Respondent: 15585313 / Kim Styles  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 Paddocks Site A57 – 4 traveller pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12709  Respondent: 15585313 / Kim Styles  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): ()

All this proposed development will not only ruin the essence of the villages but it will make one vast sprawling city out of Woking and Guildford which will be almost joined together. Perhaps GBC is thinking of re-naming the new city, Wokford or Guilding. Bus services are sparse. Ripley High street is very narrow as are a lot of Send roads, mornings and evenings its very congested. More traffic coming from Send Hill would only make things worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12699  Respondent: 15585313 / Kim Styles  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 any villages from the Green Belt

I OBJECT TO – All erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/12700  Respondent: 15585313 / Kim Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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: PSLPP16/12705  Respondent: 15585313 / Kim Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 the the failure of GBC to identify sufficient brownfield sites within the urban area, which should be targeted first before the green belt is even considered. There is land available at Slyfield for further commercial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/577  Respondent: 15585313 / Kim Styles  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? ( )
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 its 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:

---

Do you consider this section of the document; complies with 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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Do you consider this section of the document; complies with 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:

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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 extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
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: pslp172/4041  Respondent: 15585313 / Kim Styles  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): ()

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.

... 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: pslp17q/399  Respondent: 15585313 / Kim Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 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: PSLPS16/6172  Respondent: 15585345 / Wanita Styles  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 HUGE OVERDEVELOPMENT OF 2200 HOMES AT GOSDEN HILL FARM a25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6171  Respondent: 15585345 / Wanita Styles  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 – A35 WISLEY AIRFIELD – THE DEVELOPMENT OF 2000 HOUSES IN THE GREENBELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6167  Respondent: 15585345 / Wanita Styles  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 hiding of development by “deferment” (A24, A25, A26, A43)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO – A43 GARLICKS ARCH

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6170  Respondent: 15585345 / Wanita Styles  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 – A43a THE CLANDON ON OFF RAMP – THIS WILL NOT HELP TRAFFIC PROBLEMS THROUGH THE VILLAGES IT WILL INTENSIFY IT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6168  Respondent: 15585345 / Wanita Styles  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 – A45 THE TALBOT - OVERDEVPOLMENT IN A CONSERVATION AREA

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6169  Respondent: 15585345 / Wanita Styles  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 -A57 THE PADDOCKS - TRAVELLERS PITCHES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12718  Respondent: 15585345 / Wanita Styles  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO – THE EXCLUSION OF ANY VILLAGE FROM THE GREENBELT p2

I OBJECT TO – THE ERADICATION OF ALL GREEN BELT p2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15940  Respondent: 15585345 / Wanita Styles  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15939  Respondent: 15585345 / Wanita Styles  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO – the local plan as the proposed development is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15941  Respondent: 15585345 / Wanita Styles  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO – the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/567  Respondent: 15585345 / Wanita Styles  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): ()

11. I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.
I 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:

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:** pslp172/4019  **Respondent:** 15585345 / Wanita Styles  **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 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.

2. 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.

5. 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:** pslp172/4021  **Respondent:** 15585345 / Wanita Styles  **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:**
6. 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.

... 

9. 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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Do you consider this section of the document; complies 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 Farm Site A25. Overdevelopment of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO – Wisley Airfield A35 inappropriate 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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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO – the late inclusion of Garlicks Arch Site A43. The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO – The Talbot Site A45. This is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT TO – The Paddocks Site A57 – 4 traveller pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO – the removal of any Villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12719  Respondent: 15585409 / Vanessa Styles  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 I-7 of the questionnaire): ()

I OBJECT TO – the local plan as the proposed development is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12720  Respondent: 15585409 / Vanessa Styles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-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: pslp173/449  Respondent: 15585409 / Vanessa Styles  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 I-7 of the questionnaire): ()
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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?

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I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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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: pslp172/3448  Respondent: 15585409 / Vanessa Styles  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 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: pslp172/3451  Respondent: 15585409 / Vanessa Styles  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 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:
Do you consider this section of 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 removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3453  Respondent: 15585409 / Vanessa Styles  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

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.

1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1678  Respondent: 15585409 / Vanessa Styles  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: PSLPA16/3069  Respondent: 15585441 / Laurie Will  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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17. 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): ()

18. 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: PSLPS16/6180  Respondent: 15585441 / Laurie Will  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): ()

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 brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6181  **Respondent:** 15585441 / Laurie Will  **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): ()

16.  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:** PSLPP16/12727  **Respondent:** 15585441 / Laurie Will  **Agent:**

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Page 1398 of 1920
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/12725  Respondent:  15585441 / Laurie Will  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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:

Comment ID:  PSLPP16/12726  Respondent:  15585441 / Laurie Will  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.  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: PSLPP16/12738  Respondent: 15585441 / Laurie Will  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/“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: PSLPP16/12733  Respondent: 15585441 / Laurie Will  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 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.

14. 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: PSLPP16/12736  Respondent: 15585441 / Laurie Will  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 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: PSLPP16/12728  Respondent: 15585441 / Laurie Will  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. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

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.

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: PSLP16/12729  Respondent: 15585441 / Laurie Will  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 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: PSLPP16/12731  Respondent: 15585441 / Laurie Will  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 OBJECTto 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: PSLPP16/12724  Respondent: 15585441 / Laurie Will  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 OBJECTto not protecting the Green Belt (Policy P2)

I OBJECTto the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12722  Respondent: 15585441 / Laurie Will  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 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: PSLPP16/12723  Respondent: 15585441 / Laurie Will  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
2. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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 represent the owners of an international horticultural business in Cobham which owns land in Cobham and Ockham. Our Ockham site is very important for the development of the business and there are regular movements between the two sites of Tractors and cultivation and/or harvesting equipment. We also have vehicle movements between the two sites moving commercial stock.

We object very strongly to the re-inclusion of the Former Wisley Airfield/Three Farms Meadows site into the Borough Local Plan after it was rejected as a suitable site for housing by the full planning committee and the planning department of the Borough.

We object to the plan’s proposal to remove the Wisley airfield/Three Farms Meadows from the green belt and we also strongly object to the similar proposals to build on green field sites in the Parish’s of East and West Horsley, Send and Ripley, and to the removal of these parish’s or parts of them from the Green Belt.

We object to the loss of the Agricultural land at The Farms Meadows through the proposed development there. Good agricultural land is a declining resource.

We object to the proposed development of the various sites in the parish’s of East and West Horsley, Ockham, Ripley and Send because they cannot happen without a big investment in services and this major requirement is hardly mentioned. Already the district is struggling with overflowing sewerage, with shortages of other utilities of Gas, water and electricity supplies. There is already a desperate shortage of school places for all age groups in this area of Surrey; Medical services are also fully stretched and inadequate for more clients. The Hospital will need to expand too.

We object to the proposals to increase the number of houses in this area by such a large amount on an annual basis. The road infrastructure is inadequate. The roads were developed in the days of the horse and cart, are narrow and cannot be widened easily because they are bounded by hedges. There are few footpaths and no cycle lanes or lighting. The mix of pedestrians, cyclists and ridden horses with fast cars and trucks are a recipe for disaster and litigation if no planning consideration was made. Due to the high traffic movements and the high number of goods vehicles using these lanes they are now breaking up. The area has some of the worst roads in the county.

We object to the proposed development of the Former Wisley Airfield on health grounds in that the site is very close to the major trunk roads of M25 and A3 and junction 10 of the M25. I have personally experienced discomfort due to the air pollution engendered by the traffic when walking on Ockham Common which is very close to the site when the wind is from the North round to the South East.

I object strongly to the development because of its likely affect on the Wisley and Ockham commons, part of the Thames Basin Heaths Special Protection Areas, particularly considering atmospheric pollution, increased footfall and dog exercising on these fragile environments.

We object to the cavalier attitude of the planning department, the planning committee and their subcontractors in devising a housing need without consideration and planning for the infrastructure needed to establish their proposals. If it were a business making such poor plans they would quickly lose their money and become bankrupt. We object as taxpayers that we would have to bear the financial consequences of the planning incompetence’s.

We strongly object to the proposals because of the effect on the picturesque villages which have a high number of old and historic houses, many listed. The proper development of The Borough should be to increase the number of high rise buildings in the centre, now that Guildford is a city, with schemes such as the station development, lesser rise building should be encouraged in the suburbs of Guildford.
We object to the lack of planning for work and employment for the residents of these developments. They cannot all take the train to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6183  Respondent: 15585537 / Sally Smith  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 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 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 wish to register my strong objection to the proposed removal of Green Belt to Ripley Surrey and surrounding villages. This part of Surrey is already overcrowded - the schools are full, one cannot get a seat on a train in the morning (although I pay over £3000 a year for ticket); the roads are log jammed all day long and frankly any more housing would make life intolerable. We put up with too much already. I live in West Byfleet and any further housing in the Ripley area would impact on the whole surrounding area. My family have been members of Ripley Cricket Club for over thirty years and any development would impact seriously on the traffic going through Ripley and seriously affect the amenity of residents.

Parvis Road is already seriously congested especially at rush hours and your plans for large numbers of new housing would put serious strain on the infrastructure of the entire area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15585601 / Sophie Corstin</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the 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?**

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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. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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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:** PSLPS16/6188  **Respondent:** 15585601 / Sophie Corstin  **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 Higheotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016
- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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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: PSLPP16/12766  Respondent: 15585601 / Sophie Corstin  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?
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?

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: PSLPP16/12763  Respondent: 15585601 / Sophie 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): ()

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: PSLPP16/12764  Respondent: 15585601 / Sophie Corstin  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?

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Do you consider this section of the 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 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.

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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): ()

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:
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:
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>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): ()

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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.

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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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Do you consider this section of the 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 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: PSLPP16/12767  Respondent: 15585601 / Sophie 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): ()

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 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:
Do you consider this section of the 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: PSLPP16/12761  Respondent: 15585601 / Sophie 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): ()

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
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.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

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: PSLPP16/12762  Respondent: 15585601 / Sophie 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): ( )

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12759  Respondent: 15585601 / Sophie Corstin  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): ()

Although I am no longer a resident in the GBC area, I am a regular visitor to my parent’s home in East Clandon and consider my objections are valid.

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: PSLPP16/12760  Respondent: 15585601 / Sophie 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): ()

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 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. 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: SQLP16/1514  Respondent: 15585601 / Sophie 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): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

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:
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:
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: SQLP16/1518  Respondent: 15585601 / Sophie 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): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3084  Respondent: 15585665 / Sophie Thompson  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? ( )
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:** PSLPA16/3085  **Respondent:** 15585665 / Sophie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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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:** PSLPS16/6192  **Respondent:** 15585665 / Sophie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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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?
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?

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?
Do you consider this section of the document; complies with 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: PSLPP16/12781  Respondent: 15585665 / Sophie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 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: PSLPP16/12786  Respondent: 15585665 / Sophie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy 11)

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.

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)

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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<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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<tr>
<td>I object to not protecting the Green Belt (Policy P2)</td>
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<tr>
<td>I object to removing Ripley, Send and Cclandon 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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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to development in areas at risk of flooding (Policy P4)</td>
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<tr>
<td>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</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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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?

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<th>Comment ID: PSLPP16/12783</th>
<th>Respondent: 15585665 / Sophie Thompson</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): ()

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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<tr>
<th>Comment ID: PSLPS16/6190</th>
<th>Respondent: 15585697 / Florence Clarke</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to state that I strongly object to the site allocation A26, Blackwell Farm being put forward for housing development.

As of an area of Outstanding Natural Beauty and a green belt it is madness that such a plot should be put forward for development when there are numerous brown field sites, derelict buildings and wastelands to build upon in the area. Until these options are exhausted, building on green field sites should not even be an option.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPA16/3086</th>
<th>Respondent: 15585761 / Christine Forss</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I wish to register my objection to the removal of the green belt from the villages of Chilworth and Shalford. Having lived in Chilworth for over 10 years and presently in Guildford town centre, I feel the green areas we are so lucky to have in this area should be protected.

I do understand the need for housing as I am in that bracket of needing a house in the area that I have grown up, but I feel this should be considered development. Preferably making use of areas which have had a building of some sort or disused site etc. Once green belt areas are developed there is no going back.

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: PSLPA16/3089</th>
<th>Respondent: 15585793 / Mark Horigan</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:
Comment ID: PSLPA16/3088  Respondent: 15585793 / Mark Horigan  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:

Comment ID: PSLPS16/6195  Respondent: 15585793 / Mark Horigan  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.

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: PSLPS16/6196  Respondent: 15585793 / Mark Horigan  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 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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<tr>
<th>Comment ID: PSLPP16/12796</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)

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: PSLPP16/12791</th>
<th>Respondent: 15585793 / Mark Horigan</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>
I object to 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: PSLPP16/12798   Respondent: 15585793 / Mark Horigan   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: PSLPP16/12800   Respondent: 15585793 / Mark Horigan   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:
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.

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

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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</table>

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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<th><strong>Comment ID:</strong> PSLPP16/12794 <strong>Respondent:</strong> 15585793 / Mark Horigan <strong>Agent:</strong></th>
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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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Comment ID: pslp172/2193  Respondent: 15585793 / Mark Horigan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2192  Respondent: 15585793 / Mark Horigan  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?

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<th>Comment ID:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the increase in housing proposed in Tannery Lane (site A42)</td>
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<tr>
<td>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.</td>
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<tr>
<td>I object to the extended development in the Green Belt (Policy P2, Site A43)</td>
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<tr>
<td>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.</td>
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<tr>
<td>I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch</td>
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<td>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.</td>
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Do you consider this section of the document; complies with 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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<tr>
<th>Comment ID: pslp172/2191</th>
<th>Respondent: 15585793 / Mark Horigan</th>
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<td>Document: 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): ()

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:
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: pslp172/2194  Respondent: 15585793 / Mark Horigan  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: pslp171/679  Respondent: 15585793 / Mark Horigan  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:

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<tr>
<th>Comment ID: pslp171/683</th>
<th>Respondent: 15585793 / Mark Horigan</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
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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 Clock barn 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?

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<th>Comment ID: pslp171/680</th>
<th>Respondent: 15585793 / Mark Horigan</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</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.

Issues of particular concern to me include:
- flawed evidence exaggerating the need 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: PSLPA16/3096  Respondent: 15585889 / Tony Rodnight  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): ()

Issues of particular concern to me include:
- flawed evidence exaggerating the need 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: PSLPP16/12820  Respondent: 15585889 / Tony Rodnight  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): ()
proposed plan should protect (not erode) the character of Guildford town and the surrounding countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12821  Respondent: 15585889 / Tony Rodnight  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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plans to expand Guildford along the A3, ie. 2,000 homes on Gosden Hill. Burpham will undoubtedly create increased traffic congestion problems leading into Guildford town centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12825  Respondent: 15585889 / Tony Rodnight  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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inadequate transport infrastructure strategies to alleviate problems arising from (a) current transportation and (b) future transportation developments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12823  Respondent: 15585889 / Tony Rodnight  Agent:
Document: Proposed Submission Local Plan: strategy 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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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Guildford Council has failed to place constraints on overall housing growth, unlike other councils</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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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>ignoring Brownfield sites which could be used for student accommodation and new homes for the elderly</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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<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td>unjustified Green Belt 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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Answer (if comment is on questions 1-7 of the questionnaire): ()
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the above plan for the following reasons:

I object to the use of Green Belt land which should be protected by the NPPF which prevents the merging of settlement.

I object to this plan because there are no exceptional circumstances that would warrant destruction of Green Belt land that is covered by ancient woodland and is a particularly sensitive conservation area.

I object to the use of protected Green Belt land for industrial development since land will be available at Slyfield Industrial Park should it be needed, which according to the latest Employment Land Needs Assessment 2015, it is not (80% reduction in employment floor space).

I object to the erosion of quality of life though inadequate infrastructure to support this development. The proposed takes no account of GBC's Transport Assessment which highlights infrastructure overload. Improving access in a limited part of the system (Burnt Common) simply gridlocks adjacent areas such as Send and Ripley.

I object to the lack of social infrastructure to support this plan. Health, Education and Transport provision in this area is already inadequate within the hinterland of the proposed development.

I object that this site is new and was not included in the Regulation 18 draft and has not been consulted on previously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3238  Respondent: 15585953 / Glyn and Avis Morris  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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Do you consider this section of the document; 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.

No exceptional circumstances to allow Unnecessary Development have been shown by Borough Council to warrant the 2000 houses and traveller sites being built on Gosden Hill Farm.

Destroying Green Belt is wrong for many reasons stated by the GRA. The too high figures from SHMA must be reduced to Waverley and Woking councils reductions AT LEAST. Guildfords report on housing figures is UNSOUND,
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?**

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I am writing to protest most strongly against the proposed Gosden Hill Farm developments which, if they go ahead will have a devastating effect on the area including Burpham Village where I am a long–time resident. It seems quite incomprehensible that precious Green Belt land, which should be sacrosanct and preserved for posterity could be swept aside and built over in this way, against the wishes of the local people, just to turn a millionaire landowner into, presumably, a multi–billionaire, the justification being to relieve pressure on the urban areas. People living in the urban areas surely need the Green Belt on their doorstep as their amenity and quality environment.

I am sure the many flaws in this grossly overambitious plan have been pointed out to you by people better qualified than myself. Anyone can see the problems which would arise from traffic management, the dangers of flooding [already a hazard along the drain running from Merrow Lane to the River Wey] [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 the need for additional services of all kinds. My motivation for writing to you is the preservation of the precious fields and woods which will be lost for ever if this development goes ahead, which God forbid.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPS16/6221</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3125  Respondent: 15586017 / C Maslin  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): ()

Maps

The maps have different ratios which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog’s Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called ‘Guildford Urban’ which of course does not exist and hence this could be misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6222  Respondent: 15586017 / C Maslin  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Maps
Do you consider this section of the document; complies with 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 Blackwell Farm in this Local Plan, for the following reasons:

• The southern slopes of the Hog’s back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
• Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review
• The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
• Blackwell Farm is very effective in fulfilling the functions of Green Belt.
• Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
• More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
• The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
• Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in ‘Guildford urban area’ and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6253  Respondent: 15586017 / C Maslin  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): ()
POLICY A26 BLACKWELL FARM

I object to policy A26 Blackwell Farm.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm 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 NPFF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - ‘checking the unrestricted sprawl of large built-up areas’. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 ‘assists in safeguarding the countryside from encroachment’ - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - ‘assists in urban regeneration by encouraging the recycling of derelict and other urban land’.

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPFF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPFF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, 'The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB'. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPFF? Finally, nearly the whole site has been identified as a ‘candidate area’ for AONB status in the Landscape Evaluation Study commissioned by Compton, Worpleyd and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.
The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion ‘hot spots’: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should ‘identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15’. In a footnote to this, it further adds, ‘To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.’ I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be ‘viably developed’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6254  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A55

Do you consider this section of 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 A55

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to ‘enable delivery’. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/12942  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 MAKING BETTER PLACES

I object to Policy D1 Making better places,

I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12945  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D2 SUSTAINABLE DESIGN

I object to Policy D2 Sustainable design, construction and energy.

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, ‘like a golden thread’. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to ‘greenwashing’, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring
vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 HISTORIC ENVIRONMENT

I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to 'support development' that might 'enhance' heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the 'reasoned justification', the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy D4 Development in Urban Areas

I object to policy D4 Development in urban areas and inset villages.

This policy that does not address the opportunity for building in the urban area.

The plan envisages that 40% of homes built will be ‘affordable’, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called ‘affordable’ homes or pay an ‘affordable’ rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

The Brownfield Opportunity

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, ‘to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land’. In order to comply with central planning policy we need a brownfield strategy that states clearly. ‘We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/12929  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 SUSTAINABLE EMPLOYMENT

I object to policy E1 sustainable employment.

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appears to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. e.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).
Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is given to the opportunity of B1 space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12931   Respondent: 15586017 / C Maslin   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE

I object to policy E2 location for new employment floor space.

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%).

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.
The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12933  **Respondent:** 15586017 / C Maslin  **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 E3 MAINTAINING EMPLOYMENT CAPACITY**

I object to Policy E3 maintaining employment capacity.

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound.

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.
London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12936  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E4: SURREY RESEARCH PARK

I object to policy E4 Surrey research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for ‘any other’ office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

Monitoring indicators should include new start-ups and new patents created.

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.
I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

Consideration should be given to the concept of shared 'enterprise hubs' where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the 'enterprise village' concept.

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

The Surrey Research Park currently extends to 65,000 sq m.

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12938  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E5 RURAL ECONOMY

I object to policy E5 Rural Economy.

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.
Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

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 LEISURE AND VISITOR EXPERIENCE

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a ‘must see’ destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit.

Guildford the historic ‘Gateway to the Surrey Hills’ has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new ‘Pilgrims Trail’ similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to 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.

There is a need 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 RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

THE TOWN CENTRE OPPORTUNITY
I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more 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: PSLPP16/12915  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1 HOMES FOR ALL

I object to 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 any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

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 underused 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. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath.

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: PSLPP16/12916  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 AFFORDABLE HOMES

I object to policy H2 Affordable homes.

‘Affordable’ homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of ‘affordability’ is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY H3 RURAL EXCEPTION HOMES

I object to policy H3 Rural Exception Homes

This is a type of 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 expensive 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: PSLPP16/12953  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1 INFRASTRUCTURE AND DELIVERY

I object to policy I1 Infrastructure and delivery.

Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem.

The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its
Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.

This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable.

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 local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

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 Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model.

Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods.

Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan.

The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to 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 SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network.

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, as discussed below.

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 be given some relief by 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, such as Compton Village, 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’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton.

The cumulative effect of the additional traffic generated by the developments in the 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’.

Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered 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 has to cope with the additional demand arising from 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 – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common 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 Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction.

Ash – development in Ash is not specifically addressed, but there are major 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 remark 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. 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. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And 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, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan 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. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the 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, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY I2 DEPARTMENT FOR TRANSPORT

I object to policy I2 Supporting the Department of Transport’s ‘Road Investment Strategy’

This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12958  Respondent: 15586017 / C Maslin  Agent:

POLICY I3 SUSTAINABLE TRANSPORT

I object to policy I3 Sustainable transport for new developments.

This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general ‘modal shift’ from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they
cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town.

I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12961  Respondent: 15586017  C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I4 GREEN AND BLUE INFRASTRUCTURE

I object to policy I4 green and blue infrastructure.

This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

ABSENCE OF POLICY ON RIVER WEY
I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;

The special character of the landscape and townscape in the corridor is protected or improved;

Views both within and from the corridor which contribute to this special character are protected or improved;

Where appropriate, public access is provided to and along the River and the Navigations.

The Nature Conservation value of the site is protected or improved.

GREEN BELT SITES

I object to ALL Green Belt sites allocated for development in the local plan.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that ‘allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.’ This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

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?

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Do you consider this section of 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 AONB

I object to policy P1 Surrey Hills Area of Outstanding National 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.
Much of 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…’

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: ‘There is a presumption against major development in the AONB in accordance with NPPF.’

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

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. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. 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?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2 GREEN BELT

I object to Policy P2 green belt

This policy states, 'the general extent of the Green Belt has been retained.' This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

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. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

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. More importantly, there is no 'acceptable' percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the ‘insetting’ of 14 villages from the Green Belt. 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 hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.
To ‘inset’ two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed ‘insetting’ and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12922  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P3 COUNTRYSIDE

I object to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: ‘we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location’. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the ‘coalescence between the Ash and Tongham urban area and Aldershot’ than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12926  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4 FLOOD RISK

I object to policy P4 Flood risk and water source protection zones.

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12928  Respondent: 15586017 / C Maslin  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 SPAs

I object to policy P5 Thames Basin Heath Special Protection Areas.

This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.
nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 SUSTAINABLE DEVELOPMENT

I object to policy S1 as stated and the presumption in favour of sustainable development.

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.’ Policy S1 ought to set a clear framework. No definition of sustainable development’ is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise ‘to secure development that secures the economic, social and environmental conditions in the area’ omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as ‘sustainable’, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications ‘wherever possible’ and ‘without delay’ reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/12914 | Respondent: 15586017 / C Maslin | 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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<th>POLICY S2 PLANNING FOR THE BOROUGH</th>
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<tr>
<td>I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.</td>
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The OAN ‘objectively assessed need’ figure in the SHMA of 693 homes a year is far too high

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably 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.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. ‘ It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.’

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development ‘because of the environmental constraints which exist in the County, including Green Belt’. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled ‘A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford’. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He 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.
NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints 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 have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.
The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

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.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. ‘the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt’ - Nick Boles to Sir Paul Beresford MP 7th February 2014.

1. ‘we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt’ – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

2. ‘Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt’ – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

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 endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Green belt to constrain the level of development.

The Employment Land Needs Assessment I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will ‘buck the national trend’ in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.
Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure object

The infrastructure schedule makes reference to ‘improvements’ without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these ‘improvements’ will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). (Some existing buildings already reach 5-7 levels in height).

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have. The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different
times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation. Indeed it does not correspond to the statistics generated by the Vehicle Activated Signals which have been monitoring traffic speeds through Compton for a number of years.

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 improvement schemes in place. More detailed analysis of the junctions and queuing is required. 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'. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill-thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of
the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the ‘Guildford urban area’ when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford ‘needs’. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to ‘double accounting’ as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)I object

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 SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

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.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land AssessmentI object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as ‘unsuitable’ with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside StudyI object
GBC’s Green Belt & Countryside Study does not value appropriately the ‘fundamental aim’ of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

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 less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

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.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for ‘informal recreation’. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object

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.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high's of 68 using National bias adjustment.
Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

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

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.
It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot ‘buy into’ this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant ‘yet to be discussed’ schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.
It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.
The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as ‘South West Guildford Urban’ is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 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 Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included ‘significant changes’ according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1524  Respondent: 15586017 / C Maslin  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): ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green /belt, which is protected by the NPPF. Greed is not ‘an exceptional circumstance’ and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Plan is supposed to be informed by residents and by parish councils and residents’ groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of ‘double speak’ has led to absurdities such as ‘affordable housing’ which is over £300,000 i.e. ten times the average salary; ‘safeguarding’ which does not mean protection of land as most people would think, but rather potential future development and ‘insetting’ which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

‘About ancient woodlands, of course they are very attractive things, but they are ancient and trees don’t last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life’

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?
It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3101  **Respondent:** 15586049 / Les Perkins  **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 currently work in the borough and on reading the local plan i was appalled and its lack of important detail and its glossy presumption of predetermined facts.

I work in some of the local villages that would be affected by the proposal and am shocked at the harm i see this plan doing. i am generally on the road during school drop of time and think the amount of traffic on small country roads such as in East Horsley as positively dangerous, just last week i saw a group of children have a narrow escape whilst waiting to catch the bus to the Howard, the increase in traffic associated with the local plan brings the likelihood of fatalities all the closer the fact there have not been any yet is extremely fortuitous, for this mainly and other obvious facts such as lack of amenities, public services i object to the plan as it stands.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12862  **Respondent:** 15586145 / Joan Choules  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 regards to the planning of houses etc on the Wisley Airfield which is a green belt area, I would like to stress my concerns with regards to the lifting of the green belt, as this could set a precedence for future developments, which are now in the green belt area for housing.

As you can appreciate this would change the face of Surrey significantly and spoil what we have at present, which is one of the greenest areas and lovely local shops, hospitals and schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3955  Respondent: 15587041 / Martin Goodchild  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): ()

1. The site will have a severe impact on local traffic and infrastructure:

The roads around East Horsley are to say the least poor with many being little more than winding lanes without pavements and the main through roads Forest Road and Ockham Road South and North pass through residential areas that are in many places narrow and unlit. Any increase in the local population will only put added pressure to the volume of traffic going through the village centre and in and around Horsley Station and Effingham Junction Station which will add to the congestion at peak hours. The likely further traffic congestion at the A3 / M25 intersection will only exacerbate the existing problems.

Other facilities in the Horsleys such as schools and the East Horsley Medical centre will not be able to cope with the additional population planned as a result of the Wisley Airfield and proposals for housing in the Horsleys.

2. The development is totally out of keeping with the local character, context and distinctiveness:

East Horsley with 1,760 homes is currently the largest settlement borough outside Guildford itself with a housing density of 8.1dph within its settlement area. The proposal at Wisley Airfield is to build 2,100 homes, which is 19% more housing than in East Horsley at a density of 6 times as much (49.1 dph) which is similar to that utilised in a metropolitan area. This sort of development is completely out of character for an area of rural Surrey and the character of the whole area would be irreparably damaged if the Wisley Airfield development goes ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3599  Respondent: 15587041 / Martin Goodchild  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
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The plans indicate a further 173 homes in East Horsley and 420 in West Horsley, a total of 593. This results in an approximate increase of households of 10% in East Horsley and 35% in West Horsley. This will substantially increase the volume of traffic in the village not least when added to the likely number of motor vehicles if the proposed Wisley airfield development also takes place. It will also put a strain on the village facilities such as schools, the medical centre and the stations all of which are at capacity now.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPA16/3956  | Respondent: 15587041 / Martin Goodchild  | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North |

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1. **New homes in the Horsleys:**

   The plans indicate a further 173 homes in East Horsley and 420 in West Horsley, a total of 593. This results in an approximate increase of households of 10% in East Horsley and 35% in West Horsley. This will substantially increase the volume of traffic in the village not least when added to the likely number of motor vehicles if the proposed Wisley Airfield development also takes place. It will also put a strain on the village facilities such as schools, the medical centre and the stations all of which are at capacity now.

   **In summary** it appears to me that the proposals for new homes in the Horsleys and at Wisley Airfield have been poorly thought out with little regard for the Metropolitan Green Belt rules. There has been a complete failure to consider the impact on the infrastructure and environment across a widespread area, the strain on local facilities and the fact that the proposed developments are totally out of character for the rural area of this part of Surrey.

   I would therefore urge Guildford Borough Council not to countenance any development at the Wisley Airfield site and to considerably reduce the planned housing increase in the Horsleys.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPS16/6231  | Respondent: 15587041 / Martin Goodchild  | 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): ()

Proposal to remove the Horsleys from the Green Belt, the Proposal to extend the boundaries of the settlement areas of the Horsleys and the Proposed Submission Local Plan: Policy A3J, land at former Wisley Airfield, Ockham

I am writing in connection with the proposal to remove the Horsleys from the Green Belt, the proposal to extend the boundaries of the settlement areas of the Horsleys as well as the proposal to develop over 2000 homes at what was once the Wisley Airfield in Ockham to all of which I object for the following reasons:

1. **The proposed changes represent a fundamental breach of Metropolitan Green Belt rules:** The GBC’s Planning Officer said in relation to a previous planning application in relation to the Wisley Airfield site in rejecting the application said "It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified". It is clearly stated in Ministerial Guidance that **unfulfilled housing need does not qualify as very special circumstances** and therefore the removal of this site from the Green Belt is entirely unjustifiable in relation to the Metropolitan Green Belt rules.

2. **The proposed site at Wisley Airfield does not meet acceptable levels of Sustainability**

   In its Sustainability Appraisal of the Guildford Borough Local Plan issued in June 2016 AECOM rated this site as the worst of the six sites in terms of sustainability with 8 out of the 21 criteria graded as Red (poor sustainability).

   Amongst the factors that influenced this grading are the following: no public transport currently servicing the area, the nearest train stations are more than 3 miles away, there is insufficient parking at both local stations to accommodate additional commuters, there are no schools or medical services, new roads will be needed as travel from the proposed site will depend on motor vehicles etc.

   In essence this is a proposal to create a large scale green field settlement in a poorly sited green field location.

3. **The site will have a severe impact on local traffic and infrastructure:**

   The roads around East Horsley are to say the least poor with many being little more than winding lanes without pavements and the main through roads Forest Road and Ockham Road South and North pass through residential areas that are in many places narrow and unlit. Any increase in the local population will only put added pressure to the volume of traffic going through the village centre and in and around Horsley Station and Effingham Junction Station which will add to the congestion at peak hours. The likely further traffic congestion at the A3 / M25 intersection will only exacerbate the existing problems.

   Other facilities in the Horsleys such as schools and the East Horsley Medical centre will not be able to cope with the additional population planned as a result of the Wisley Airfield and proposals for housing in the Horsleys.

4. **The development is totally out of keeping with the local character, context and distinctiveness:**

   East Horsley with 1,760 homes is currently the largest settlement borough outside Guildford itself with a housing density of 8.1dph within its settlement area. The proposal at Wisley Airfield is to build 2,100 homes, which is 19% more housing than
in East Horsley at a density of 6 times as much (49.1dph) which is similar to that utilised in a metropolitan area. This sort of development is completely out of character for an area of rural Surrey and the character of the whole area would be irreparably damaged if the Wisley Airfield development goes ahead.

5. New homes in the Horsleys:

The plans indicate a further 173 homes in East Horsley and 420 in West Horsley, a total of 593. This results in an approximate increase of households of 10% in East Horsley and 35% in West Horsley. This will substantially increase the volume of traffic in the village not least when added to the likely number of motor vehicles if the proposed Wisley Airfield development also takes place. It will also put a strain on the village facilities such as schools, the medical centre and the stations all of which are at capacity now.

**In summary** it appears to me that the proposals for new homes in the Horsleys and at Wisley Airfield have been poorly thought out with little regard for the Metropolitan Green Belt rules. There has been a complete failure to consider the impact on the infrastructure and environment across a widespread area, the strain on local facilities and the fact that the proposed developments are totally out of character for the rural area of this part of Surrey.

I would therefore urge Guildford Borough Council not to countenance any development at the Wisley Airfield site and to considerably reduce the planned housing increase in the Horsleys.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. 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?

2. 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPS16/6234  Respondent: 15587073 / Mark Sweeting  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Sites 43 & 43a were introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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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:** PSLPS16/6235  **Respondent:** 15587073 / Mark Sweeting  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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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 sites 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:

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<th>Comment ID: PSLPP16/12870</th>
<th>Respondent: 15587073 / Mark Sweeting</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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1. 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12872</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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1. 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12871  Respondent: 15587073 / Mark 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): ()

1. These developments place a disproportionate burden on 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: PSLPA16/3121  Respondent: 15587105 / John Downes  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: PSLPA16/3122  Respondent: 15587105 / John Downes  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?

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<th>Comment ID: PSLPS16/6247</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 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: PSLPS16/6249  Respondent: 15587105 / John Downes  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: PSLPP16/12891  Respondent: 15587105 / John Downes  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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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12889</th>
<th>Respondent: 15587105 / John Downes</th>
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</table>

**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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12890</th>
<th>Respondent: 15587105 / John Downes</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/12912</th>
<th>Respondent: 15587105 / John Downes</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</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. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I 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.

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: PSLPP16/12911  Respondent: 15587105 / John Downes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12892  Respondent: 15587105 / John Downes  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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12893  Respondent: 15587105 / John Downes  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 development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12895  Respondent: 15587105 / John Downes  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:

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Comment ID: PSLPP16/12898  Respondent: 15587105 / John Downes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12884  Respondent: 15587105 / John Downes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12885  Respondent: 15587105 / John Downes  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:
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: PSLPP16/12883  Respondent: 15587105 / John Downes  Agent: 15587105 / John Downes

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any 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:

Comment ID: PSLPA16/3123  Respondent: 15587137 / John Oliver  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): ()

Sustainability Appraisal

This indicates that the Council’s preferred ONA option is Option 4 – ONA plus 14%. This cannot be justified. If the SHMA has been calculated correctly, and the ONA correctly extrapolated from it, there is no need to build in a buffer of over 1,600 homes in excess of SHMA (or, as in another place, 1,900). This is over-development to the equivalent almost of Blackwell Farm or Gosden Hill. Either of these projects could be cancelled or much reduced with no effect on meeting the SHMA.

Conclusion

There are huge difficulties in bringing forward a plan that will satisfy everyone. But the proposals (which I have just skimmed across above) are built on shaky foundations, are not explicit enough in detail and paint a picture of over-commercialisation of the Guildford environment.

One of the critical factors is whether an A3 tunnel would be built. Only once decided can plans begin to come together of what the housing need will be, particularly in the Burpham area. If those plans continue to include Gosden Hill, no housing should be built until the tunnel has been finished.

If there is to be no tunnel, the immediate need would be for a four-way road interchange just north of Potters Lane. A two way in Burpham spells disaster for Burpham and Jacobs Well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6245  Respondent: 15587137 / John Oliver  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? ( )
Turning towards my own area in Burpham, I am astonished that the proposed Gosden Hill development has been so badly thought out in terms of the effects it will have on the existing Burpham area, particularly that of increased road traffic. The effects will ‘knock on’ to the wider area of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy D3

“Guildford borough’s historic environment is intrinsically part of what makes Guildford the place it is. The historic environment includes many important heritage assets, both designated and undesignated, that contribute to the borough’s character, sense of place and quality of life”. Agreed. This is crucial to the identity of Guildford. One of the things that makes it feel historic is its firm boundaries. The Plan proposals elongate the town, detracting from its sense of separateness from its surrounding environment. In particular the proposals to the east (Gosden Hill and the nearby villages) mean that the definition between town and village becomes blurred and ends up as urban sprawl. It also represents a further increment towards being absorbed by outer London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E1

My comments here would simply reiterate my earlier comments about growth. The pursuit of growth is what is drawing the additional pressures upon Guildford. There should be a reduced emphasis on growth and a greater emphasis on being the best at what we already do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12905  Respondent: 15587137 / John Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E2

“The NPPF requires planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21st century. Paragraph 21 requires the Council to “support existing business sectors” and to “plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries”. This has already been done. It needs to go no further. Just because there is a demand from profit-motivated organisations does not mean that the public sector has to respond – i.e. give way. The identified need at the University is for student accommodation. The land being sought for research development should be set aside for that accommodation and thereby ease the pressure on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12897  Respondent: 15587137 / John Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1

This policy, significantly, omits mentioning young, single people. Their housing needs are not being met by the Plan. Even “affordable housing” is simply beyond their reach in this area. This is a crucial omission as the Plan makes a point of the fact that there is a skills shortage in the area. There must be a direct correlation between this and the lack of availability of truly affordable housing. Young people are moving away.
“We want a flexible housing stock that helps meet the wide range of accommodation needs so we will expect new homes to be flexible, accessible, adaptable and age friendly.” This sounds fine, but where are the developers who will design cheap and acceptable (in the planning sense) houses for young individuals and young couples? GBC, quite rightly, states that any development must be of high quality. But quality comes at a price that young people simply cannot afford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12899  **Respondent:** 15587137 / John Oliver  **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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**Policy H2**

These are much the same arguments as in Policy H1. Guildford’s affordability ratio is astronomical compared to the rest of the UK. In general terms, young people simply cannot afford to live here.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12887  **Respondent:** 15587137 / John Oliver  **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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Guildford desperately needs a local plan which meets a vision of, amongst other things, providing much-needed, additional housing and the infrastructure to cope with the consequent increased demand, not only from within the borough but from outside. The plan is also an opportunity to restructure the transport element of the town’s infrastructure in a way that efficiently meets current and future needs.

I do not underestimate the task that this represents and would like to be able to support the proposed Submission Plan. However, I find that omissions of information, lack of firm commitment to, or clarity about, particular infrastructure issues and a fundamental shift towards the reshaping of our town mean that I cannot do so.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: PSLPP16/12907  Respondent: 15587137 / John Oliver  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Policy I1**

The need to meet the infrastructure demands of the present and the future, in terms of any Plan submitted to the Secretary of State, are critical. The Plan does not give sufficient assurances that the water, sewage, electricity, roads, medical and teaching needs will be met. For example, unless a four-way interchange is developed just north of Potters Lane on the A3, Burpham will reach crisis point in terms of congestion. Congestion equals pollution, i.e. reduced air quality. Air quality will also be an important issue for any development at Gosden Hill and needs to be properly assessed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/12908  Respondent: 15587137 / John Oliver  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Policy I1**

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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: PSLPP16/12909  Respondent: 15587137 / John Oliver  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? ( )
### Policy I2

“The A3 Guildford scheme is subject to feasibility study and then progression through Highways England’s Project Control Framework during Road Period 1. As a result, the scheme could either be the widening of the existing A3 carriageways or a tunnel option”. The most likely north entrance for a tunnel at the north east end of the town would be at Gosden Hill. It is, therefore, absurd to consider building houses on this land until a decision has been reached on whether a tunnel will be built.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Policy I3

‘Sustainable Movement Corridor’ – it is impossible to see how this will work. Physically, in Burpham it would involve a significant widening of the road which would totally destroy the character of Burpham’s ‘Main St’. It is also difficult to see how this would affect behaviour given that most people would be afraid to use it, given the traffic volumes, and any would simply be incapable of using it. There are a lot of older people in Burpham.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
In addition, whilst I am very pleased to see the commitment to the preservation of the Thames Weald Heaths and the Surrey Hills AONB, I am very concerned indeed that the Green Belt is under threat to such an extent, particularly those areas affected to the east of the town. The implications of the extension of the town towards the villages (and them towards Guildford) and towards London have serious implications for the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12900  Respondent: 15587137 / John Oliver  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

This states “However, as a local designation, the AGLV holds less weight than the AONB in policy terms”. Whilst true, this is a serious attempt to minimise the importance of AGLV land and condition readers to the idea of AGLV land being built upon. This is unadulterated spin. AGLVs need to be protected to prevent pressure on AONBs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12902  Respondent: 15587137 / John Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 main aim of Green Belt is to prevent urban sprawl by keeping land permanently open”. This policy need go no further. However, the proposals in the Plan make significant inroads into the Green Belt in direct contravention of the NPPF. The NPPF states that planning permission should only be granted in very special circumstances.

Cumulatively, the housing need is becoming critical. But it is not very special. These circumstances have crept up upon us over a period of decades and it is only the magnitude of the problem which is causing the current anxiety. However, this anxiety can be reduced significantly by a realistic calculation of the ONA, a better assessment of need and land availability and a stringent application of the affordable housing principle which does not allow developers to change their ‘offer’ half way through.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12894  Respondent: 15587137 / John Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1

This policy is not sustainable, although a firm definition is not provided in the Plan. This is an expansionist policy and does not sustain the Guildford environment for future generations. They will wake up to ongoing urban sprawl which removes increasing amounts of the Green Belt and increases the prospect of merging with, at the least, Woking, and, at worst, London.

The erosion of the Green Belt, engendered by the Plan, will remove significant amounts of land which are currently used by the community to exercise and find enjoyment in open space. Even the “A3 boot sale” at Nuthill Fruit Farm is a day out in the country for thousands of people. This will all disappear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12896  Respondent: 15587137 / John Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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

- This states, “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).” As previously stated, why do we have to focus on growth? A better strategy for the residents of Guildford, as evinced by the number of protests about this and the previous version of the Plan, is containing and maximising what we have.
- “There will also be opportunities for rural exception sites which are small-scale developments providing affordable homes in locations where new homes would not usually be appropriate”. The Plan gives no reason why these sites should now be regarded as unexceptional. It is a deliberate move to make the numbers up at whatever cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/18660  Respondent:  15587137 / John Oliver  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Growth

One of the key themes of the Plan is that is seeks to stimulate economic growth and retain Guildford’s economic competitiveness with other towns. It is this very adherence to the growth mantra that has caused the town’s problems:

- the transport infrastructure is creaking because there are so many people trying to get in and out of the town. This will only be exacerbated by building more out-of-town housing complexes;
- housing is in short supply because the town has had a policy of attracting more and more businesses, thereby increasing demand for more homes;
- skilled labour is in short supply because we have attracted these same businesses;
- there is a tacit acceptance that because people want to live here, we have to accede to that demand.

We are a prosperous town with what we have. We do not need to grow in order to retain that prosperity. Guildford will always be popular, for its historic interest, quality of housing, surrounding countryside and, as far is business is concerned, its affluent population. Growth simply leads to urban sprawl and the merging of unique areas – and, in Guildford borough’s case, these are unique historical areas.

Rather than expand the University of Surrey Research Park, the land should be used for the housing that will, under GBC’s plans, be placed in the Green Belt.

Guildford’s aim should be to be the best at what it is or already has. Better housing, better facilities, better research facilities, better education, better care, and a better environment for its population (not a gradually worsening environment through the Plan proposals). These should be the guiding principles. Guildford should not succumb to pressure from developers whose only interest is profit.

Brexit

The Plan is pre-Brexit. The Surrey Advertiser tells me that the SHMA will be looked at in the light of Brexit. But it also quotes Cllr Spooner saying, “we will revisit both the SHMA and the employment land needs assessment (ELNA) prior to the submission of the local plan to the secretary of state”. If this consideration changes the SHMA and, therefore, the ONA, it must surely change the whole basis of the Plan. People have already commented on the proposals based on pre-Brexit figures and assertions. Everyone who comments on the Plan will have to do so before any re-assessment is made. Morally,
politically and practically, GBC cannot submit the Plan to the Secretary of State without receiving the views of the Guildford residents and its organisations in the light of these latest developments.

SHMA/ONA

It is completely undemocratic that the SHMA is not available for scrutiny. How could GBC enter into a contract where it is unable to assess the validity of the assumptions and calculations that are built into one of the most important calculations that affects Guildford’s citizens? How am I to know whether the calculations are skewed in some way – particularly towards the desires of developers.

All other views I have seen regarding the ONA, at 693, condemn it as ludicrously high. Independent research is casting significant doubt over this figure. It needs to be re-assessed in the light of this research (and the Brexit considerations) and a revised Plan needs to be re-submitted to the public for comment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3124  Respondent: 15587169 / Sylvia Denison  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): ()

Concluding Comments

The views I have expressed above are based on my experience as a resident in this area for some 16 years and have experienced the various traffic routes which are in issue with the current proposals, as a regular driver at peak and off peak times. It is inevitable that an increase of residential housing and industrial use at the level proposed, brings an increase in the population and traffic.

The current infrastructure (medical, educational and policing) is clearly at its limit to provide for the current population. GP appointments on the day of need are already difficult to obtain and requests to make an appointment at a future date becoming quite a rarity. Police visibility is no longer valued it seems. It is said that resources now need to be matched to risk for example, cyber crime, historical crimes against the vulnerable, and other areas of major crime. Patrol presence is a feature of policing long ago, and is no longer in the best interests of the community (National Council of Police Chiefs). In accepting this as a feature of national policing policy and practice, I remain more concerned that increases in a population still carries with it potential conflicts between individuals and cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6252  Respondent: 15587169 / Sylvia Denison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Clockbarn Nursery, Tannery Lane

I object to the development proposal for 45 houses, again because of inadequate access and volume of traffic. Tannery Lane is far too narrow and has a number of bends making additional traffic an obvious non starter. It is already hazardous for vehicles attempting to join the main Send Road. Planning permission has previously been given for 64 apartments at the Tannery and building a Marina, both of which will generate additional heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Garlicks Arch

I object to the development of some 400 houses plus 7000sq m of industrial and warehousing building on the Garlicks Arch.

The Portsmouth Road is often used as a substitute for the A3 in terms of speed and bad driving, which would multiply with the level of additional traffic which must be anticipated with the proposed development on this site. I live in nearby Send Marsh and often see instances of drivers taking high risks in pulling out of Send Marsh Road into the Portsmouth Road. Again the potential for quite serious traffic collisions would be increased from the level of the increase in traffic flow along the Portsmouth Road. This particular junction is badly in need of traffic safety measures as it stands, the increase of significantly more traffic would increase the potential for collisions to an unacceptable point. The consequences of an accompanying increase of heavy goods vehicles associated with the proposed industrial site are self evident.

The thought of a major increase in traffic flow facing local people needs to be seriously considered before any approval is given to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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 Interchange

I object to a new intersection as proposed. It would lead to an increase through Send and surrounding villages which the existing infrastructure is unable to withstand.

Send in particular would become a permanent through route for traffic avoiding the A3 Northbound during the morning peak hours. The reverse would apply in respect of the A3 southbound for the evening (5pm-7pm) traffic flow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6251  Respondent: 15587169 / Sylvia Denison  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 development

I object to the development of another 40 houses and 2 traveller site pitches on this site. The area is a popular beauty area, which fits the Green Belt designation. Access for the new residents would be via a very narrow single track road, again impacting on traffic passing through send villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12904  Respondent: 15587169 / Sylvia Denison  Agent:
I object to local villages within the above area being removed from the Green Belt. Send has grown over the years and I feel is at its capacity now. It is also a popular through route for traffic which frequently comes to a standstill at peak times for people making necessary journeys to work and schools. Some of the roads in the village are too narrow for current traffic flow and will therefore be unable to carry the inevitable additional vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Answer (if comment is on questions 1-7 of the questionnaire):**

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**I object to the 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:**

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**Comment ID:** PSLPS16/6258  **Respondent:** 15587233 / Jane Clark  **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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**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.
- 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 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: PSLPS16/6257  Respondent: 15587233 / Jane Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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: PSLPP16/12990  Respondent: 15587233 / Jane Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12985  Respondent: 15587233 / Jane Clark  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)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12994  Respondent: 15587233 / Jane Clark  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, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12996  Respondent: 15587233 / Jane Clark  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:

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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.

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.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<td><strong>I object to development in areas which are at risk of flooding (Policy P4)</strong></td>
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<tr>
<td>The Plan does not take adequate account of flood risk as required by National Planning Policy.</td>
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<tr>
<td>The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a <strong>higher</strong> risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.</td>
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<td><strong>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</strong></td>
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<tr>
<td>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.</td>
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<td>The development should be in urban areas where there is sustainable transport.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to 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:

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Comment ID: PSLPA16/3139  Respondent: 15587361 / Aileen Creegan  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: PSLPA16/3140  Respondent: 15587361 / Aileen Creegan  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, which is 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. Furthermore, 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): ()

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 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 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 a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is for making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light 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: PSLPS16/6267  Respondent: 15587361 / Aileen Creegan  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: PSLPP16/13022  Respondent: 15587361 / Aileen Creegan  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: PSLPP16/13019  Respondent: 15587361 / Aileen Creegan  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 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: PSLPP16/13020  Respondent: 15587361 / Aileen Creegan  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: PSLPP16/13021  Respondent: 15587361 / Aileen Creegan  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: PSLPP16/13029  Respondent: 15587361 / Aileen Creegan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: | PSLPP16/13026 | Respondent: | 15587361 / Aileen Creegan | 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 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:** | PSLPP16/13028 | **Respondent:** | 15587361 / Aileen Creegan | **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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I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital; where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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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<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? ( )

1546
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: PSLPP16/13016  Respondent: 15587361 / Aileen Creegan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13017  Respondent: 15587361 / Aileen Creegan  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: PSLPP16/13012  Respondent: 15587361 / Aileen Creegan  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 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:** PSLPP16/13014  **Respondent:** 15587361 / Aileen Creegan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with 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 commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 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:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6268</th>
<th>Respondent:</th>
<th>15587457 / Andrew Bale</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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Do you consider this section of the 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 an objection to the above named local plan and the above section for the following reasons:

1. Impact of traffic on Send village and neighbouring villages as a result of an additional 400 homes being built. Improvements to road network in the form of two new slip roads is not expected till between 2021-33 and at a cost of £10m each it is highly likely they will never be delivered.
2. The addition of 400 homes to the small village of Send is a disproportionate amount of development and there is a complete lack of provision for Doctors Surgeries or Schools.
3. The creation of a second employment area in Send when there are existing industrial units at Burnt Common Nurseries and space to expand to satisfy the demand. The proposed mixed development will cause issues such as road safety due to mixing commercial and private vehicles in the development. Secondly the proximity of the industrial units to the residential may put of potential tenants concerned about restrictive working hours.
4. The Garlick’s Arch site is in the Green Belt and used for agricultural purpose. Any development will result in the loss of rural employment.
5. The Local Plan is misleading in that it does not explain that Policies A43 and A43a are intrinsically connected due to the owners of Garlick’s Arch gifting the land for the slip roads on condition of receiving planning permission for housing.
6. The deliverability of Garlick’s Arch in 0 -5 years is highly questionable due to the following – Garlick’s Arch being in Flood Zone 3, Four electricity pylons running through the centre of the site, Ancient Woodland dating back to the 16th Century, Pollution levels currently recorded, No existing screening protecting the site from noise or visual impact of the A3.
7. The Garlick’s Arch site replaced the Burnt Common Nurseries Site which was included in all previous drafts of the local plan and was allocated for industrial use and housing. Whereas the Garlick’s Arch site is Green Belt and has never been previously developed the Burnt Common Nurseries site has been previously developed and includes three industrial units totalling 50,000 square feet. This site was previously highlighted as key to meeting the industrial needs of the Borough.
8. The last minute inclusion of Garlick’s Arch means that it has not been threw the rigorous scrutiny that all the other sites have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPA16/3143</th>
<th>Respondent: 15587489 / Thomas Batterbury</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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<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 live in West Horsley and object to the Guildford local plan. I strongly OBJECT to West Horsley and the surrounding area being taken out of the green belt.

This will undoubtedly lead to even more houses being built in the future, increased population density and over crowded spaces. We paid a premium to move to this lovely area and do not want to watch it turn into a less desirable area.

I commute to central London 5 days a week, the trains are already very busy with the current train service, which quite simply would not be able to cope with a larger number of commuters.

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: PSLPP16/13046</th>
<th>Respondent: 15587521 / Paul French</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to your Local Plan because of the way it totally ignores Green Belt constraints.

Brownfield land should be used for building before any green fields. Housing numbers must reflect real local need not developers' wishes and your proposed housing numbers are considered far too high by everyone who has looked at them closely, except GL Hearn's sub-contractors who are keeping their working methods a secret. It would seem that not even you know how they were arrived at. The Metropolitan Green Belt was conceived for the benefit of all and must not be ignored or considered an easy target for building land.
You campaigned to protect the Green Belt prior to your election to the council and you should now be ashamed of yourselves for backing this iniquitous Local Plan. There are so many procedural and planning errors by GBC and its consultants that this plan must be rethought. All protected sites and nature reserves must be conserved, the Green Belt must be maintained and the wishes of your electorate must be listened to. Remember you are public servants there to serve your constituents and not to bully us into accepting this appalling Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3149  **Respondent:** 15587553 / Malcolm Stuart  **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): ()

Why, why 593 MORE houses in the Horsley Green Belt? Justification? Why, why the Horsleys taken out of the Green Belt? Justification? Infrastructure could not cope with that number of houses! Why REMOVE Thatchers Hotel when there is a shortage of hotels in area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3151  **Respondent:** 15587585 / Philip Mason  **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): ()

**Guildford Borough Proposed Submission Local Plan: strategy and sites: June 2016**

I am writing to make comment on the above in respect of West Horsley.

The proposed number of new dwellings proposed for the 4 parish development sites (385) is excessive and would result in an increase of 35% on the current number of homes. I object to this most strongly as it will change the character of the village entirely and without any increase in infrastructure cause a dramatic strain on local service such as roads, schools and medical facilities. There would be an increase of at least 1500 residents and probably 1000 cars and this seems in complete contradiction to Strategic Policy S1: Presumption in favour of sustainable development.
Of particular concern is the current level of flooding in the village which should be covered by Policy 11 waste water infrastructure in which West Horsley is not mentioned. The gullies in this part of the village were recently cleared which is a good thing but the result of this in the following storm downpour was that the water cleared by the gullies then shot out of the manhole in Ripley Lane like a tropical waterfall causing the road to flood. What effect would an extra 385 dwellings and their waste water have on this infrastructure?

There is no evidence of the need for this number of homes in West Horsley. Local surveys show that there is the need for a small number of affordable homes for local people not large estates. The proportion of dwellings proposed for the green belt areas is disproportionate to those proposed for brownfield sites in Guildford itself which are much more sustainable being served by Public Transport, employment and other facilities. It is a mark of shame that GBC appears incapable, and has been for many years, of facilitating development of the vast tracks of derelict land it owns in and around North Street which could provide large numbers of dwellings for young people and others who may wish to downsize as well as families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13059  **Respondent:** 15587617 / Anne Forss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to the proposed removal of Chilworth from the green belt, having lived in the village for over 20 years and enjoyed the surrounding countryside.

I do understand there is a need for considered development to allow families to live in the area but this should not be at the expense of building on green belt areas which is then lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3153  **Respondent:** 15587649 / James Masterman  **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. HOUSING NUMBERS

It is suggested that 693 houses per year need to be built, totalling 14000 over the next 20 years. How can residents be asked to believe such a figure when

- this is double the number calculated by GBC 4 years ago
- GBC refuse to share with their customers (ie borough residents), information on the key elements and inputs to the model used.

The figure produced represents a 25% increase in borough housing stock and thus population. Given the massive impact this will have on the borough, its calculation elements must be opened up for proper local scrutiny and debate. Additionally, following the recent BREXIT vote, some assumptions of a diminution in housing stock pressure over the 20 year time horizon should now be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6274  Respondent: 15587649 / James Masterman 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): ()

3, GOSDEN HILL FARM a25

The proposal is to build on green belt, but the draft local plan does not provide any evidence of the exceptional circumstances that are required to justify such use of green belt land. This is unacceptable.

Planning applications for this land have been turned down in the past - what's changed???

The 2000 homes proposed is about the same as the existing size of Burpham. Traffic impact on already congested London Road and New Inn Lane will be unsupportable (see traffic comment above).

Some mention is made of a new rail station at Merrow, which would allow commuting to London, without driving to Guildford. Again this appears to be aspirational only, as no plan appears in the relevant rail companies for a Merrow station. Again this is an unsound part of the "plan".

No part of the Borough should shoulder a disproportionate amount of the council's new building proposals. Any significant increase across the borough will not work without a tunnel, a 100% increase locally to Merrow and Burpham will just not work. GBC should, like Woking and Waverly, consider applying constraints on housing growth, and also recognise a duty to local residents in specific areas to maximize local housing growth impact to no more than the borough wide increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13061  Respondent: 15587649 / James Masterman Agent:
1. TRAFFIC/ROADS/NOISE

Traffic congestion in Guildford is already chronic, and its impacts felt in many ways. In my area

1. Traffic noise from the A3 can be heard all over Burpham and into some of the estates in Merrow
2. Local access roads into and out of Guildford are badly congested in AM and PM rush hours, with the A3 backed up from Stag Hill to the Burpham turning on a very frequent basis.
3. The ever increasing amount of traffic on the A3 is making the already inadequate joining points with the A31 and hospital/university northbound, and town north and south bound, positively dangerous. (Have GBC recently looked at serious accident data and costs, and impact on emergency response rates for ambulances and fire services.....)
4. Local planning approval of the Aldi Burpham store has led to traffic backed up Burpham Lane waiting for car park spaces, onto the roundabout with the London Road. This is happening ESPECIALLY AT WEEKENDS, the one time of the week that the London Road used to be relatively free flowing at this point.

Before any significant housing development takes place in the North of the Borough, the above problems need to be solved. If not, the chronic daily congestion will turn to gridlock.

I believe the answer to all of this is for GBC to think boldly, and FAST TRACK the A3 tunnel suggested, leaving the original A3 for local traffic. Benefits would be numerous, with POSITIVE outcomes for a big proportion of borough residents, businesses, and passing goods traffic.

- Reduction in loss of life and of serious injury impacts by improving safety for this stretch of the A3
- A3 Traffic noise elimination from Ripley through to Burpham, the town and cathedral/university campuses
- Local and trunk road significant congestion reduction and thus time and money savings for residents and business
- Pollution containment

This is GBCs chance to do something that the vast majority of residents would welcome, AND BENEFIT from. If a 2 km tunnel can be justified for Hindhead (population 4000, thus 0.5 tunnel metres per resident), lets secure the 8KM tunnel for Guildford (population 137 000, thus only 0.058 tunnel metres per resident).

A comment too on phasing - optimize and build the A3 tunnel first, don't reduce your flexibility and increase your tunnel cost by premature commitment to large scale housing developments at various points along the way.

The impact of the tunnel would then allow a more sensible debate on borough housing increase with the right infrastructure backbone already in place.

A word too on the suggested road developments within the draft plan. With respect to the north of the Borough and in the light of the massive housing proposals from Wisley through to Gosden Hill, these road developments alone, will be ineffective. They will simply deliver more traffic onto a full A3, and locally a full New Inn Lane/London Road. Congestion will worsen yet further, perhaps leading to frequent gridlock.

Furthermore, the suggested new Sustainable movement corridor in the London Road area will be anything but sustainable - adding to local traffic noise and pollution, and road safety impacts especially with respect to pedestrians and school children. Additionally how will this be built without compulsory purchase of local housing and business properties
I understand that the roads part of the plan is "aspirational" only. How can this be acceptable, against a housing increase proposal of 25% over 20 years. THIS WILL JUST NOT WORK.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1543  Respondent: 15587649 / James Masterman  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 write with respect to the 2016 Draft Local plan, being a Guildford Borough resident living in Burpham.

In summary, I find it in general unsound, and only aspirational in some critical aspects. Being over 1800 pages of high level prose, it is impossible for any resident to comment on fully. In some areas it is in white text on coloured background, making it even difficult to read. As such, as a "plan" for residents' comment, about the future development of their borough, it is not really even fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/315  Respondent: 15587649 / James Masterman  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 evidence strongly indicates Guildford, population growth in overstated by 40%, due to errors in student statistics w.r.t. leaves from the borough at course end time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/317  Respondent: 15587649 / James Masterman  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): ()

Infrastructure plans lack ANY certainty, rendering the planning base naive at best, catastrophic at worse.

The figure 13893 new dwellings over the planning period has been challenged down to as law as a real need for only 7676 new dwellings. The former lacks any credibility especially in the light of the councils continuing refusal to share its planning models assumptions and inputs.

This remains a plan without need, credibility and at great local social, health and economic cost. 7 to 8000 dwellings will be more than sufficient over the plan period - concentrate on that and the infrastructure to support it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6272  Respondent: 15587681 / Elisabeth Hauck  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 most strongly 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 2000 dwellings

Point 1. Erosion of the Green Belt.

I am a resident of West Horsley (my address is [redacted]) and my son and his family also live in Horsley. I moved to this area 4 years ago drawn by the unspoilt quality of the area and the sense of community in the village. The fact that these villages are in the Green Belt is fundamental to the reason why there has been tight control on housing development in these villages, maintaining the rural nature of this whole area. I strongly object to removing East and West Horsley from the Green Belt. The Green Belt is one of the best controls established in this country to make sure that we hold on to our green space, if we allow this to be lost in this area we will open the door to a steady urbanisation. This should not and need not happen.

Point 2. The Extent of Development Proposed

The proposed plan includes at least 148 more homes in E. Horsley, at least 385 more homes in W.Horsley, plus 2,068 homes on the Wisley site (2.1 miles away) 400 more at burnt Common (3.2 miles away) and 2,000 at Gosden Hill Farm (4.2 miles away). This amount of development in such a small area borders on the ridiculous! There is no doubt that we need to be able to provide affordable housing for young people in this country but there have to be better ways than this - explosive housing development in a rural area. The social impact of radical change like this is never good.

Point 3. Pressure on Roads, Parking, Education and Medical Facilities

Page 1557 of 1920
In all these development plans very little attention has been placed on the infrastructure that will be necessary to support the extra people who will be living in these new homes - the cars they will be driving, the schools the children will need and the medical services that will need to be stretched beyond the way they are now to accommodate so many more people. Just adding up the number of new homes in the developments described above gives a total of 5,000 new homes with a knock on of at least 5,000 extra cars (probably more), 10,000 plus more people to be catered for by NHS facilities and certainly several thousand children to be educated.

Lack of Imagination Developing Brown Field Sites

There is ample brown field land in areas not in the Green Belt. It is surely better to develop these and protect our green spaces for generations to come. Why, for example, in a small island like ours do we not encourage more apartment living? A broad sweep of development may well be an 'efficient' way of increasing our housing stock and is an approach which I am sure will be welcomed by building developers! But what is needed in these communities is flexible and moderate development which takes into account both the value of the rural environment and the capability of essential social facilities to support the housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3152  Respondent: 15587713 / Jennifer Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a current member of the Horsley Countryside Preservation Society and spent many years of my youth living in both E. and W. Horsley.

I have very fond memories of this beautiful rural area.

I was horrified when I read in a recent HCPS magazine of the hundreds of extra homes that Guildford Borough Council are planning to build in these areas and the encroachment on the precious Green Belt….which plays such a major part as being the Lungs of the country.

It is very sad to see the probable demise of ‘Thatchers’, a major land mark for so many years. My sister, at one stage, owned Fangate Manor Farm, and is horrified how this land is proposed to be subdivided into a housing estate.

I object very strongly to these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3154  Respondent: 15587745 / Paul Gates  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 building & development of new houses in the A3 corridor.

2/ I OBJECT to the very idea of Garlick’s Arch (Ripley/Send/Burnt Common) being developed any more.

3/ I OBJECT to any proposal that will increase Traffic in the local area – it is already like Piccadilly Circus at times.

4/ I OBJECT to any proposal that removes/reduces the sacred green fields and common land in the Ripley/Send/Clandon/ Burnt Common areas.

5/ I OBJECT to the limited consultation period.

6/ I OBJECT to ALL erosion of the Green Belt.

7/ I OBJECT to the last minute inclusion of new sites with less than two weeks notice.

8/ I OBJECT to any new Exit/Entry roads of the A3 at Burnt Common – this can only make things worse.

9/ I OBJECT to any schemes that change the fundamental ‘rural countryside’ feeling of Wisley, Ripley, Send, Clandon etc.

10/ I OBJECT to the lack of immediate provision for new schools.

11/ I OBJECT to the lack of any immediate provision for Doctors Surgeries.

12/ I OBJECT to the lack of any evidence for the ‘fictitious’ alleged ‘housing need’ numbers.

13/ I OBJECT to the disproportionate amount of development in one area of the Borough.

14/ I OBJECT to ANY proposals that will turn Ripley/Send/Clandon/Burnt Common into a Goldsworth Park/Knaphill/St Johns look-a-like.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13063  Respondent: 15587745 / Paul Gates  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Traffic is already beyond belief, not to mention the already high noise and pollution levels.

To add to this and increase the traffic, noise and pollution is both totally unnecessary and unwarranted

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13062   Respondent: 15587745 / Paul Gates   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 e.mail is to register my DISAPPROVAL to the proposed 14,000 NEW HOMES under the revised Draft Local plan. These include but are not limited to ‘large strategic sites’ such as Garlick’s Arch, Gosden Hill/Clandon and Wisley.

It is criminal to even consider the re-listing of our local villages as ‘inset’ ie: no longer under the ‘Green Belt’ structure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6275   Respondent: 15587777 / Rosemary Cozens   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, and industrial park and a highway on the slopes of the Hog's Back at Blackwell Fam, 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 additonal ancient woodland from the geen 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: PSLPA16/3155  | Respondent: 15587809 / Maureen Slater  | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was absolutely horrified to hear of the proposed ruination of the Horsleys by cramming it with hundreds of houses in a beautiful rural area.

I spent most of my younger years there enjoying the woods, riding in the Sheepleas and walks with the dogs on the many footpaths. We attended many happy functions at the famous Thatchers, in fact we recently on a return visit to the U.K, met up with friends there for lunch. For 10 years I owned and lived at Fangate Manor.

A beautiful smallholding of 6 acres where I had cows, chickens, pigs and dogs. Manor farm was one of my neighbours. I have been told that even that is to be subdivided------how DARE you ruin that and Thatchers. Is nothing sacred any more in the rural villages, will the U.K become like Australia, destroy the heritage

And stick up concrete multi-story housing blocks. I hope not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPA16/3164  | Respondent: 15587905 / Clare Claxton  | 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: PSLPS16/6286  | Respondent: 15587905 / Clare Claxton  | 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?

Attached documents:

Comment ID: PSLPS16/6285  Respondent: 15587905 / Clare Claxton  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: PSLPP16/13104  Respondent: 15587905 / Clare Claxton  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:

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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?

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:
** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

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:

Comment ID: PSLPP16/13099  Respondent: 15587905 / Clare Claxton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/13101  Respondent: 15587905 / Clare Claxton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>** I object to the local plan as the development proposed is not sustainable (Policy S1)</td>
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<tr>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructuture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
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<td>** I object to the Borough Wide Strategy (Policy S2)</td>
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<td>There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.</td>
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As a long term resident of West Horsley, I would like to submit my strong objection to the Draft Local Plan for Guildford. West Horsley is currently a semi-rural barrier to the onward urban sprawl which has relentlessly paved over Surrey. There are actually fields here and country walks for all to enjoy including people who I know who come down from London to walk here. I can see no justification for the following:

- removing West Horsley from the Green Belt
- building another 35% more houses - this is way, way too much although I fully accept the need for some new housing
- building on fields!

To do the above would permanently destroy one of Surrey's remaining rural villages beyond recognition.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3167  **Respondent:** 15588001 / Mary Jane Godfrey  **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): (*)*

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:** PSLPA16/3168  **Respondent:** 15588001 / Mary Jane Godfrey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Do you consider this section of the document; complies with 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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Comment ID: PSLPS16/6292  Respondent: 15588001 / Mary Jane Godfrey  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.

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6293  Respondent: 15588001 / Mary Jane Godfrey  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: PSLPP16/13136  Respondent: 15588001 / Mary Jane Godfrey  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: PSLPP16/13133  Respondent: 15588001 / Mary Jane Godfrey  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: PSLPP16/13138  Respondent: 15588001 / Mary Jane Godfrey  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)

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: PSLPP16/13137  Respondent: 15588001 / Mary Jane Godfrey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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:
I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13132  Respondent: 15588001 / Mary Jane Godfrey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies 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: PSLPP16/13134  Respondent: 15588001 / Mary Jane Godfrey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/13130  Respondent: 15588001 / Mary Jane Godfrey  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: PSLPP16/13135  Respondent: 15588001 / Mary Jane Godfrey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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: PSLPS16/6287  Respondent: 15588033 / Oliver Hogben  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am a Send resident, writing during this consultation period to make clear that I object wholesale to every aspect of the proposed GBC Local Plan. For the purposes of absolute clarity, I object to:

- Policy A25
- Policy A35
- Policy A42
- Policy A43
- Policy A43a
- Policy A44

All of the above policies should be removed from the GBC Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6291  **Respondent:** 15588033 / Oliver Hogben  **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 proposed population growth at site A43 in particular (48% - 3.2% per annum over the plan period), where 400 new homes are being proposed, is an unsustainable and entirely ill-conceived one. The Office of National Statistics projects a growth of 0.57% across the whole UK for the same period, therefore I am curious as to how the architects of the GBC Local Plan consider this to be a sensible one. I also refer you to the lack of due process in your own planning procedures, whereby a last-minute change was made in April/May 2016 to the GBC Local Plan to add the Garlick's Arch development. From October 2013-May 2016 there had been no reference made to a development at Garlick's Arch. Instead there had been regular consultation on Burnt Common Warehouse. This latter development was inexplicably deleted from the proposals in May 2016 and replaced with a previously unmentioned development at Garlick's Arch, adding a further 300 homes to the Local Plan. Such an act is exceptionally bad practice (I concur entirely with Tibbalds Planning and Urban Design in this regard); please could the Council explain why it considers making this last-minute decision, after almost three years of consultation, an example of acceptable policy-making? I therefore restate my objection to policy A43; it should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6290  **Respondent:** 15588033 / Oliver Hogben  **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): ()
It is evident that Guildford Borough Council's extraordinary determination to contravene National Planning Policy Framework for Green Belt protection remains at the forefront of your operations, even after the objections raised by Sir Paul Beresford MP back in 2014 which highlighted the entirely erroneous beginnings of the Local Plan and the many examples of poor practice carried out by GBC in their initiation of the process. GBC will, therefore, accept that the Local Plan was initiated under entirely misguided circumstances, without appropriate consultation and, as such, that the entire process is flawed and has been tainted by chronic mismanagement from the outset. Unfortunately, lack of consultation has continued with the recent addition of policy A43a - the proposed new A3 slip roads, which have not been properly appraised and only recently added. For example, in the 11th May review of the draft Proposed Submission Local Plan (reviewed by Guildford Council Executive), it is notable that Appendix C does not contain any reference to the need for a new A3 slip road at A247 Clandon Road. The first reference made to it is on May 24th (Appendix C) when considered as part of the draft Local Plan by the Full Council. Perhaps light can be shed as to why it was only on May 24th that the need was identified for these new slip roads, when this planning process began in October 2013? Such an action is one of two things: last-minute, in which case the decision has not been fully appraised and reviewed, or 'back door', whereby GBC is attempting to add in these proposed slip roads at the last-possible juncture so that they go unnoticed by members of the public. In either case, you will agree that this is poor process and will not stand up to further scrutiny.

To supplement the evidence of this catalogue of inappropriate procedure, I will refer you to the comprehensive document produced by Tibbalds Planning and Urban Design, appointed planning consultants acting on behalf of Send Parish Council, who have conducted a review in to the GBC Local Plan. I quote points 4.15 and 4.16 of their document in full here:

- The June 2016 Strategic Highways Assessment is a strategic transport modelling study that informs decision making surrounding the suitability of potential development sites and future highway mitigation proposals which have been identified. Appendix A sets out the strategic residential sites assessed as part of the highways assessment. The main residential site in Send is as follows: Ref. 2258 - Land south east of London Road Land south east of London Road, Send (part of B13-d) (known as Burnt Common) 260 homes and 140 flats.

It is unclear which site this refers to. Site 2258 appears to be a reference to the Feb 2016 LAA site reference for the 'Land at Garlick's Arch', however the site description appears to refer to the Land around Burnt Common Warehouse, formerly allocated as Site A43. The B13-d reference appears to relate to the January 2013 Green Belt and Countryside Review area around Burnt Common, not Garlick's Arch, which falls under land parcel B14 in this document. This shows a high degree of inconsistency in the appraisal and it is unclear which site is even appraised. It is possible that this was changed shortly before the Local Plan was released for consultation with the updated A43 and A43a allocations in May 2016, but it indicates that this piece of evidence is inconsistent and should be ascribed little weight.

This first issue is one of many examples of a lack of strategy in the GBC Local Plan, and evidence of a lack of information gathering. **I restate my objection to policy A43a; it should be removed.** Tibbalds Planning and Urban Design identify that the proposed level of new housing in the Local Plan is greater than the identified need, and therefore constitutes "over-development". Equally, Tibbalds Planning and Urban Design have identified an over-provision of land in the GBC Local Plan, which has failed to be justified by the Leader of the Council. Such a lack of justification and methodology is evidence of the points raised in my first paragraph, and references the "cavalier" approach that Sir Paul Beresford MP describes GBC having taken. In the same document, Tibbalds Planning and Urban Design refer to the GBC Local Plan referencing the May 2014 Settlement Hierarchy Document, which the Local Plan cites as key evidence. I quote the following point made by Tibbalds Planning and Urban Design in its entirety here:

- Paragraph 3.4.2 states that large rural villages are unsuitable for substantial growth but capable of accommodating an extension. Medium sized villages are unsuitable for substantial growth but capable of taking appropriate residential infill and development to meet local needs, defined as ‘employment, amenity and community facilities as well as small scale infill housing and rural exception sites for affordable housing’. Send Parish consider the proposed level of development in Send Marsh / Burnt Common to represent substantial and inappropriate growth, contrary to this strategy for development.

As a four-year resident of Send I concur entirely with the Tibbalds Planning and Urban Design report point 3.6, commenting on the lack of public transport service in Send. Send is served only by hourly busses to Guildford, and the Villages Medical Centre has no bus service at all to it. There is extremely limited parking at the Send village shops, and...
the shops that are in the village are very limited (a handful of newsagents/convenience stores, a café, a charity shop, two takeaway restaurants, and some miscellaneous businesses - not enough to sustain someone who does not drive). Consequently, anyone living in these proposed new developments and needing to access these businesses, the Villages Medical Centre, or the local primary school will likely need to drive to them. This seems to be an extremely ill-thought-through policy in terms of environmental sensitivity, and I suspect it is not one that GBC has actually considered at all as part of the Local Plan. I would be interested to hear your thoughts on whether this has been considered by members. I also have major concerns about traffic congestion in the village, which is already an issue, and the safety of Tannery Lane. I have already personally witnessed a serious car accident in the last few months on Polesden Lane/Tannery Lane junction, due to it being 2.75m wide. When this becomes a hub for major traffic, including commercial vehicles of considerable size, accidents will inevitably increase as it is not possible to increase the size of the Polesden Road junction. The same issue applies at Send Hill in relation to Policy A44. I am sure that GBC have considered this as part of the Local Plan and are prepared for the increase in traffic accidents in already dangerous areas; perhaps you could tell me the exact nature of the discussions by Council members when they debated this? Consequently, I restate my objections to policies A42 and A44; they should be removed.

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 current GBC Local Plan has been a catalogue of poor consultation, bad decision-making, and practice that is ridden with holes that will not survive the inevitable legal challenge that will follow should these changes not be implemented. Thank you for your consideration of my formal objections to the GBC Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the 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: PSLPA16/3171  Respondent: 15588065 / Nick Claxton  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:

Comment ID: PSLPS16/6296  Respondent: 15588065 / Nick Claxton  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?

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:

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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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<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</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 congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)</td>
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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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<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 congestion that development will cause to the trunk roads A3/M25 (Policy12)</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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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</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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** 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: PSLPP16/13145</th>
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<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: PSLPP16/13142  Respondent: 15588065 / Nick Claxton  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: PSLPP16/13146  Respondent: 15588065 / Nick Claxton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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: PSLPA16/3170  Respondent: 15588225 / Martin Barry  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 strongly object to proposals in relation to four Development sites in West Horsley village as laid out in The Guildford Plan. My reasons for objecting to the proposals are that I believe that the proposed addition of 385 homes is wholly inappropriate and would not be sustainable within the boundaries of our small village due to the local infrastructure. Such high density housing will inevitably result in more vehicles moving around the village which will cause more traffic congestion, noise and pollution. Currently:

- The population of West Horsley is increasing. This is due to the ongoing trend throughout the village of demolition of many single storey dwellings, typically with 2/3 bedrooms, which are being replaced with large 4/5 bedroom properties, as well as people extending existing properties to provide extra bedrooms. Most households have at least 2 cars per household, with larger houses and extended properties this is likely to increase to at least 3 or 4 cars per household.
- The roads and lanes in West Horsley are narrow in parts and are already very busy, especially at peak times. East Lane is not passable by two way traffic in parts (there are some traffic management measures in place) and this, coupled with the increasing number of parked cars on East Lane and The Street means there are regularly queues of cars waiting to pass through from one end of the village to the other. The problem is compounded by heavy vehicles (diggers, grabbers etc.) and lorries which are constantly moving around the village and parking in the streets and lanes to service the high level of building work to which I have previously referred.
- I commute to London on a daily basis via Horsley station. The station car park is regularly full to capacity on weekdays and I have recently witnessed stressful situations where people cannot access parking spaces. Increased residents will ultimately result in extra commuters who need use the station car park. There will simply be nowhere for them to park. Station Approach, which is the short, narrow, steep road that leads to the car park is already dangerously busy at peak times with cars, cyclists and pedestrians all trying to access or leave the station at the same time. This results in congestion at the bottom of Station Approach with vehicles trying to get on to Ockham Road North which is already very busy with moving traffic. There have recently been several accidents at this junction.
- There is also the concern about potential further strain on the village environment when Grange Park Opera takes up residency at West Horsley Place. This will inevitably cause traffic congestion, more noise and pollution, albeit at specific times through the year, but on top of nearly 400 extra planned homes within such a small area, I feel these proposals will impose an unsupportable burden on the entire infrastructure of not only West Horsley, but also of neighbouring East Horsley.
- The proposals also completely go against the National Planning Policy Framework which states that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

My worry is that the current proposals will result in West Horsley village becoming effectively strangled by traffic congestion and overcrowding and be negatively impacted which will result in its character being changed for future generations. Finally, I would like to add that I am totally opposed to the proposal to remove West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries as I believe this would alter the genuinely rural nature of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to strongly object to proposals in relation to the Development sites in West Horsley village as laid out in The Guildford Local Plan. My reasons for objecting to the proposals are that I believe that the proposed addition of some 395 homes is wholly inappropriate and would not be sustainable within the boundaries of our small village due to the local infrastructure. Such high density housing will inevitably result in more vehicles moving around the village which will cause more traffic congestion, noise and pollution. Currently:

- The population of West Horsley is increasing. This is due to the ongoing trend throughout the village of demolition of many single storey dwellings, typically with 2/3 bedrooms, which are being replaced with large 4/5 bedroom properties, as well as people extending existing properties to provide extra bedrooms. Most households have at least 2 cars per household, with larger houses and extended properties this is likely to increase to at least 3 or 4 cars per household. The proposal to support self build housing on the sites will no doubt follow this trend.
- The roads and lanes in West Horsley are narrow in parts and are already very busy, especially at peak times. East Lane is not passable by two way traffic in parts (there are some traffic management measures in place) and this, coupled with the increasing number of parked cars on East Lane and The Street means there are regularly queues of cars waiting to pass through from one end of the village to the other. The problem is compounded by heavy vehicles (diggers, grabbers etc.) and lorries which are constantly moving around the village and parking in the streets and lanes to service the high level of building work to which I have previously referred.
- I commute to London on a daily basis via Horsley station. The station car park is regularly full to capacity on weekdays and I have recently witnessed stressful situations where people cannot access parking spaces. Increased residents will ultimately result in extra commuters who need use the station car park. There will simply be nowhere for them to park. Station Approach, which is the short, narrow, steep road that leads to the car park is already dangerously busy at peak times with cars, cyclists and pedestrians all trying to access or leave the station at the same time. This results in congestion at the bottom of Station Approach with vehicles trying to get on to Ockham Road North which is already very busy with moving traffic. There have recently been several accidents at this junction.
- I am also confused by the removal of the site of the Thatchers Hotel complex as a potential site for development when it has infrastructure and access to the main Portsmouth Road already. If there is to be some limited development in the Horsleys why not do it here as an existing site rather than build on areas of local beauty and greenery with no appropriate access to main roads.
- The proposals also completely go against the National Planning Policy Framework which states that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

My worry is that the current proposals will result in West Horsley village becoming effectively strangled by traffic congestion and overcrowding and be negatively impacted which will result in its character being changed for future generations.

Finally, I would like to add that I am totally opposed to the proposal to extend West Horsley village boundary into the Green Belt land especially around the west side of Silkmore Lane. This will effectively grant development rights on the paddocks in the area behind the lane. This will be another erosion of the beautiful landscape which many people including walkers and cyclists enjoy in this part of our rural village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. wish to register my strong objection to the local plan in the Horsley area, which will have a severely detrimental impact on our neighbourhood. I object in particular to -
2. The density of proposed additional housing in East and West Horsley. To add 593 houses to already overcrowded schools, medical facilities and the railway will have a major negative impact on the daily life of local residents.
3. The proposal to remove the Horsley Green Belt is outrageous. No "exceptional circumstances" have been demonstrated. The Council has a duty to protect the Green Belt for future generations.
4. No sound reasons have been given for the proposed extension of the settlement areas of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6297  Respondent: 15588257 / P Day  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 development of the Wisley airfield site in Ockham would have a massive negative impact on the area, entirely changing the environment for existing residents and blighting daily life for all concerned. Public facilities are already overloaded. The heaviest impact would fall on the most vulnerable, especially the elderly.

The local plan would, in short, destroy the village community and turn the area into yet another bleak commuting dormitory.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3174  Respondent: 15588289 / Maurice Button  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): ()
Objection to Guildford Local Plan – Impact on East and West Horsley Villages

As a resident of East Horsley (see below), I am writing to object in the strongest possible terms to the proposed Guildford Local Plan, which would, if implemented as proposed, have a very harmful effect on East and West Horsley Villages.

My objections are as follows:

Proposal to remove the Horsleys from the Green Belt: The ‘exceptional circumstances’ required before taking this action have not been demonstrated.

Extension of the boundaries of the settlement areas of the Horsleys: No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional developments.

Station Parade’s designation as a ‘District Centre’: This ‘classification’ results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments.

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 the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

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 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.

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.

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.

Schools: Local schools are already at capacity – where will newcomers go to school? 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.

Medical facilities: Similar situation to the schools.

Loss of Green Belt land: Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

Transport: Misery for commuters, nowhere to park and full trains at commuting times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to: the removal of the Horsleys from the Green Belt.

There are no exceptional circumstances, these have not been demonstrated. To the proposed planning of hundreds of houses in the West Horsley and East Horsley villages.

I wish to register objections to the local plan job 13,860 new proposed houses, as not sustainable. There will be damage to local communities, these will not be villages any more.

We need to check unrestricted sprawl of large buildup areas,

We need to protect our Green Belt land and fields.

We live here because it is a village and surrounded by green fields and farmland.

We like the village atmosphere, knowing our neighbours and meeting them in our villages, being part of a small community.

I OBJECT To: the huge influx of traffic this planning will cause. Our little country roads cannot cope with the traffic as it is. The condition of our local roads is Appalling! Pot holes everywhere, causing dangerous driving, trying to avoid the holes, damaging cars. We have narrow country roads, not suitable for hundreds more ‘large family cars’. We don’t want yellow/white lines all over our village and road signs, which are quite unnecessary, which will only increase with your planning proposals. The car parking facilities are inadequate and no room for expansion.

I OBJECT To: the lack of facilities suitable for thousands more people using our Doctors Surgery. We cannot get an appointment within a week as it is, there is nowhere to expand the Surgery, are you planning to build another? The medical facilities are over stretched as it is. The local hospital The Royal Surrey is overcrowded already, there is nowhere else for us in our villages to go.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3178  Respondent: 15588321 / Zoe-Amber Purves  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 influx of thousands more families with school age children, when our local junior school, The Raleigh, is full and they want to move to a larger site now! If they took one of your sites and you took over their 2 sites, at least the planners would have a few hundred more houses and the school would be able to accommodate more new children, but only a few! Not the hundreds you propose to bring into our little villages.
We cannot accommodate these new children into the local Senior schools either. Where do you propose to build these new schools? They would then need adequate transportation, so parents cars would not always be on these country roads, emitting yet more pollution!
We are villages, people want to move here, as we did because of the quiet, the fields, the village atmosphere, and the safety of a village. Children need open spaces, greenery, the safety of a village to grow up in.

I OBJECT

there is no infrastructure which has been confirmed.
The flood plans in these areas get flooded every winter. West Horsley is known for being a flood plain area, totally unsuitable for hundreds more houses.
Thames Water has advised that the current wastewater network is unlikely to support the demand from all these developments!

I OBJECT: the overcrowding at our shops, we have two little parades of shops for the use of the two villages, not thousands more people using them. There is only limited parking, only one little supermarket, Budgens, and no access to any larger Supermarket.
Station Parade is an inappropriate target in the area for future expansion and development, the only shops we have to walk to.
The train does not take us into Cobham centre, only Stoke D’Abermen, miles away from the Cobham town Centre, how do all these new people get to ships?
We have no bus which has a regular timetable to Cobham, our nearest town, there would have to be in place public transport regularly into Cobham and Guildford.

I OBJECT: the state of our roads when thousands more people will be using them. The Drift, which is a narrow lane from West Horsley to Effingham, is already used by lorries, coaches from the schools, and many local businesses, it is full job potholes from constant use, how is that going to cope?
All our roads are narrow, we are a village, the drainage is already a problem through the village every winter.

BROWNFIELD ARE BEING IGNORED
We need more houses in the centre of towns, not out in our villages, therefore using more cars, more pollution, more congestion on our already crowded roads.
Recycle derelict and urban land.

I OBJECT To: The SHMA target housing number, which will then be increased further by the GBC to give a population increase, which is almost 70% than the official National estimates for population growth in the BoroughThis would bring alarming results of an increase of up to 35% in the existing West Horsley households, more 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:
I OBJECT to: the planning on the Wesley Airfield site

Again no infrastructure: Transport?
No regular busses to take people to the only 2 train stations near by, being Horsley or Effingham, which are both totally unsuitable for thousands more commuters either from the Wisley site or from the Horsley proposed sites. These train stations are small and serve the villagers at the moment, but could not accommodate thousands more commuters. Cobham Stn was mentioned in these plans as being a 'local station'!! This is rubbish, as it is several miles away and the Wisley inhabitants would have to go up the A3, or travel down the road by Wisley Lake to get there. This road which you are planning to close and make 'one way'!!

That road is used constantly by traffic coming from the M25 and the A3 by commuters and locals alike. It is a main thoroughfare.
The Wisley site needs busses to take the population to Guildford, Cobham. They would need a Doctors Surgery, schools, junior and senior as all the local schools are over subscribed in the surrounding areas.

There is already a large Traveller site in Effingham, we as villages do not need any more sites for them, as our own children cannot buy houses, or build, or extend from our own properties, yet the Travellers can build on Green Belt at will.

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 put an objection in against 1,8000 houses being built, an industrial park and a highway on the slopes of the
Hog’s back at Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3186  Respondent: 15588641 / Richard Purssell  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): ()

The drainage between Chalk Lane and Ockham Road has proved inadequate over the years and in the recent heavy rains,
the drain covers were raised outside the Duke of Wellington leading to hazardous driving conditions. The development of
the Thatcher's Hotel is likely to exacerbate the situation further as well as leading to the formation of a dangerous junction
as cars turn from the development, the garage and Ockham Road on to the busy A246.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6311  Respondent: 15588641 / Richard Purssell  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 proposed development of nearly 600 houses in the Horsley area in addition to the proposed 2,000 house development
at Ockham would have an enormous impact on the local infrastructure and is massively disproportionate to the existing
housing stock and infrastructure. We fully understand the need to develop further housing but this has to be done
proportionately and in areas where this can be supported rather than where it is already stretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPA16/3189  Respondent: 15588673 / Joy Davis  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 unconvinced that there is sufficient evidence to support the projected housing needs

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/13162  Respondent: 15588673 / Joy Davis  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

There is no detail about improvements in infrastructure. The ill-advised Aldi development further compromised inadequate infrastructure in Burpham (queues of traffic on the main London road mid-week and outside rush hour). Roads which are lanes (Burpham Lane, New Inn Lane etc) were never intended to support the volume of traffic they carry at present. Further development of this area, without addressing the infrastructure deficit, will exacerbate the existing problems and bring gridlock to our neighbourhood.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/13161  Respondent: 15588673 / Joy Davis  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt is precious, and encroaching that will be detrimental to the health and wellbeing of communities 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: PSLPP16/13163  Respondent: 15588673 / Joy Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The scale of development proposed to the east of Guildford is disproportionate to that proposed for the rest 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: SQLP16/1548  Respondent: 15588673 / Joy Davis  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 limited consultation period does not give all agencies the opportunity to review the documentation, and present cogent and timely responses to the proposals

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2221  Respondent: 15588673 / Joy Davis  Agent:
Housing Need

The housing need has been reviewed, but only reduced by 5% (from 693 to 653 per annum). Guildford Borough Council (GBC) has not provided information supporting these figures. Without this, their credibility is in question. Furthermore, the independent survey, commissioned by Guildford Residents Association, concluded an annual build of 404 homes would meet Guildford's needs. This is 40% less than the GBC figure.

The council, by their lack of transparency, detract from any provenance to their plan.

Gosden Hill is on Green Belt land, which should be preserved, rather than encroached, with the inexorable extension of development. This, ultimately, results in communities coming together as one large urban sprawl, with little re-oxygenating green space between…..bad for the environment, and for those who live in it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Infrastructure

Over the last 30 years, Burpham has seen 2 large housing developments and one major supermarket built, with adequate car parking.

The recent addition of the Aldi supermarket, with a car park entrance in a residential lane, has exacerbated the congestion in this area.

Our present roads are incapable of supporting more traffic which would be generated by i) the proposed housing development at Gosden Hill, and ii) the two-way proposed junction at the A3.

In conclusion, the plan is no more credible than the last, with only unsupported minor changes to the housing need figures, and no consideration for the inadequate infrastructure in the area to support the plan. I write to formally register my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPA16/3190</th>
<th>Respondent:</th>
<th>15588737 / Terry Kimber</th>
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- Serious consideration needs to be given to the type of properties built in any development within the Horsley village boundaries: it should not be assumed that 4 and 5 bedroom family houses are the only properties required. The addition of high quality apartments, similar to Maranello House, should be considered to accommodate people in the area wishing to downsize. This would free up larger family properties and increase the population density without destroying Green Belt lands.

I trust my views will be taken into account by the Council when they are considering the Local Plan.

- It is totally unacceptable to consider violating Green Belt lands when the potential for the redevelopment of brown field sites in the county have not been exhausted. Clearly the redevelopment of the Thatcher’s Hotel and Bell & Colvill sites should be encouraged together with improving the existing house stock through infill developments etc providing funds are made available to repair and maintain the existing roads and utilities infrastructure.

- East and West Horsley are both small historic villages that have expanded over the last 50 years; further major expansion will not be possible without destroying the character and ambiance of the area. The current levels of traffic passing through East Horsley is barely tolerable and the social infrastructure is straining at the moment even without further development on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<td>Document:</td>
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The redevelopment of the Wisley Airfield site would only be acceptable if development was designed and constructed to be self-sufficient and separate from Horsley in terms of the provision of schools, medical facilities, shops, public transport etc. Consideration would also need to be given to the provision of additional parking at Horsley Station.

There should be no major road widening in the area which would alter the character of the road system and villages; the road layout for the Wiseley Airfield development should be designed to discourage journeys to Horsley and use of the lanes ie access and egress from the A3 only.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3194  **Respondent:** 15588801 / Elizabeth Adams  **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):** ()

**General Comment**

GBC’s proposed Local Plan proposes a total of 4,993 new dwellings within a 5-mile radius of The Horsleys, not including many smaller sites in nearby villages, comprising.

- 533 houses on large sites in East and West Horsley (The Horsleys)
- 60 houses on small sites in The Horsleys
- 2000 houses on Wisley Airfield
- 400 houses on Burnt Common
- 2000 houses at Gosden Hill Farm (on the A3 near Burpham)

Currently there are 2808 dwellings in The Horsleys (EH 1697, WH 1111).

Thus the plan represents the follow increase in dwelling places:

- 21% within The Horsleys.
- 178% within a 5-mile radius of The Horsleys.

I can find no reason for building such large numbers of homes in The Horsleys or neighbouring villages given in the document ‘Guildford Borough Economic Strategy 2013-2031. Most of the Strategic Employment Sites proposed in Policy E1 are over 5 miles away from them.

I have commented previously under Policies I1, I2 and I3 on the existing shortcomings with, and deficiencies in, the infrastructure of The Horsleys. The proposed increase in dwellings for The Horsleys set out in the draft local plan will make matters far worse.
These policies also run contrary to NPPF paragraph 17 which specifically states that planning should be about “empowering local people to shape their surroundings”. As I have said earlier under Policy P2 and its attendant paragraphs, but it bears repeating, comments on local social media sites, notice boards by the side of our local roads and so on show the depth of local feeling against these policies. Thus I conclude that Site Policies A35-A41 do not shape the surroundings in the way in which local people would wish. There seems little doubt that the local populace feel victimised by GBC’s policies when The Horsleys will be required to build, in percentage terms, twice the amount of housing than for the Guildford urban area.

I OBJECT therefore to Site Policies A35-A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3195  Respondent: 15588801 / Elizabeth Adams  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): ()

POLICIES A37, A38, A40 & A41, located in West Horsley

These policies propose a total of 385 dwellings from these four sites. The 2011 Census showed West Horsley had 1,124 dwellings at that time. This represents an increase of 36% over the plan period, a very high proportion by any standards.

These sites all currently lie within the Green Belt. Development on them requires settlement boundary movements. As I have stated in the objection to Policy A39 above, the NPPF is quite clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. I do not believe these policies demonstrate any such circumstances and are therefore unjustified and contrary to NPPF rules. If this boundary movements are invalid then these sites remains a part of the Metropolitan Green Belt. Therefore the housing development proposal would be invalid.

I OBJECT to Policies A37, A38, A40 and A41 as they do not demonstrate the exceptional circumstances required to move the settlement boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6324  Respondent: 15588801 / Elizabeth Adams  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 this policy for the following reasons:

- **The proposed development site**

This development site is entirely within the Metropolitan Greenbelt. I can see no exceptional circumstances necessary to justify altering greenbelt boundaries stated within the draft plan. Thus the proposal is inappropriate development in the Green Belt as defined by NPPF paras 88 and 89.

I also believe that:

- A number of Public Rights of Way used by local residents cross this site.
- The majority of the site (70.1 ha) is Grade 3 quality agricultural land which has been farmed for many years and produces over a million loaves of bread a year.

NPPF para 79 states:

“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.”

I believe the above bullet points show the proposed development is contrary to this.

Therefore I OBJECT to Policy A35 as a breach of the Metropolitan Green Belt rules.

- **Impact on local traffic and infrastructure**

I have already commented under Policies I1, I2 and I3 about the serious deficiencies and shortcomings in the current infrastructure of East and West Horsley.

As I can find no specific proposals to improve the current infrastructure within this policy, the proposed development will serve only to increase these problems. Examples I foresee include:

- A severe adverse impact on road traffic in the surrounding area including my own village of East Horsley.

I calculate that the 2000 dwellings will generate what would be a considerable increase of approximately 3,000 cars locally. However there is no detail I could find on the Wisley Airfield website re improving local roads save for the rather bland statement:

“We’re also making improvements to local roads to reduce rat running, improve traffic flow and increase safety.

*The proposals also see improvements to local footpaths and bridleways.*”

This additional traffic is likely to use East Horsley’s two stations, shops, nearby schools and medical facilities.

The local roads are characteristically narrow winding ‘lanes’, many without pavements for large stretches. Some are poorly lit and others have a number of pinch points where it is difficult, and in some cases impossible, for vehicles to pass one another.

The road and junction changes which were mentioned previously as part of this development will increase traffic volumes through the village centre of East Horsley and around the station at Effingham Junction. These already suffer from traffic congestion at peak times.

- An increase in the risk of accidents.

Many schoolchildren cycle and walk along these through roads on their way to local schools. Ockham Road North and Ockham Road South have only narrow footpaths in many places through East Horsley village and Forest Road has no footpath in places.
There is concern of course for other pedestrians and cyclists. The number of cyclists has increased considerably - both locals and by groups riding in charity events, “Sportives” and for general recreation. Also the users of the narrow pavements - the elderly and infirm, parents pushing infants in pushchairs etc. – will be at increased risk.

The additional traffic will doubtless increase the likelihood of accidents and reduce the safety of their journeys.

- Station Parking

The Wisley Airfield website states that there are 9 mainline stations within 5 miles. The majority of inhabitants from this development would in fact travel from Effingham Junction or Horsley stations as they are the nearest stations. They are much quicker to reach than the other stations, especially at peak times. Further, it is cheaper and quicker to travel from these to London or Guildford (which would be the likeliest destinations) than from elsewhere.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity, something I know from personal experience! The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel to and from these stations lacks credibility.

The proposal plans to run buses through the site to major local destinations approximately every 10 minutes at peak times. Many commuters start very early and/or finish very late. It is unlikely these would be catered for. There is no local taxi service at Effingham Junction station so once again no doubt a car would be used – further increasing traffic volumes.

- Other village facilities in East Horsley

These include the medical centre and primary school. They will likely suffer adversely from a substantial increase in users as a result of this proposed development. I have commented more fully on these under Policies I1, I2 and I3

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local traffic and infrastructure

- Health and Safety Concerns

The site is located close to one of the busiest road junctions in the country, the junction of the M25 and A3. It is not uncommon for traffic on the M25 to be at a standstill at various time throughout the day and at the A3/M25 junction during peak hours. This must be detrimental to the air quality in the proposed development area. Figures on the Wisley Action Group website in the past showed the Nitrous Oxide (‘NOx’) levels being above the EU limit of 40 mg/m3. This will surely affect residents of the proposed site. Also government policy prohibits the building of schools on sites in areas where there is high NOx. Therefore the proposal to build schools on this development must be contrary to this and thus not allowable.

Also the exhaust fume from the 3,000 cars which I estimate residents will own and use will increase the problem of poor air quality.

NPPF para 109 says:

“The planning system should contribute to and enhance the natural and local environment by” ….

“... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability”.

I believe that the points I have made above demonstrate that the proposed development runs contrary to the above NPPF paragraph.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications

- Local Character

Policy H1 of the draft plan states under “Density” that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” Policy A35 fails to do this.
The area in which the development is planned is essentially rural with many pretty villages, such as Ockham, East and West Horsley and Ripley containing historic, listed or protected buildings. The proposed development is large compared to these villages. It would create a community of just over 2000 dwellings. In comparison this will be 10 times the size of Ockham, twice the size of West Horsley and bigger than East Horsley.

I suspect that Ockham, a small historic rural village, will be subsumed into the Wisley development and doubtless, in the fullness of time, forgotten. Ockham is documented as being in existence in the Domesday Book of 1086 and has a number of historic buildings including All Saints, a Grade 1 listed building which has a nave and foundations which are partly 12th century, plus other parts dating from the 13th and 15th centuries. It is also the birthplace of William of Ockham, the famous medieval philosopher and inventor of the theory of Occam’s Razor. What a tragedy that a village so rich in our history should be treated thus.

I believe the overall housing density of the Wisley development is around 49 dwellings per hectare (‘dph’) which is effectively an urban density. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. Para 4.2.5 of the draft local plan says:

“all new development must be in keeping with the character of the surrounding area”

For a setting within the middle of rural Surrey this development is completely out of character.

East Horsley is just three miles from this site. With 1,760 homes it is the largest settlement in Guildford borough outside of Guildford town and has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense. Para 4.2.8 of the draft local plan says:

“Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope.”

However I have shown in my comments under Policies I1, I2 and I3 that the infrastructure is NOT able to cope.

The development is therefore inappropriate in terms of character and density with regard to the surrounding villages.

I believe the character of this whole area would be irreparably destroyed if this proposed development were to go ahead. The development therefore fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

Thus, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context, density and distinctiveness, and therefore breaches the NPPF and Policy H1.

• Historic environment

Policy D3 of the GBC proposed plan says:

“Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question.”

There are a large number of “heritage assets” in The Horsleys, Ockham and Ripley. These all help to contribute to the character, look and feel of the villages and the environment surrounding them, which is one of the reasons people like to come and live here.

Thus, I OBJECT to Policy A35 on the grounds that it fails to meet the criteria set out in Policy D3, Historic Environment.

• Environmental Objections

It is nowadays recognised that building over the countryside stops rainwater draining away naturally into the earth, thus increasing the likelihood of flooding. The size and location of the planned development should therefore give cause for concern in this respect. The development is very close to, and slopes down towards, Ockham Road North (ORN) where it is
prone to flooding. There is a recent example of such flooding in this area. During the winter of 2013/2014 ORN was impassable for a lengthy period due to flooding.

In addition, development of this scale would, in my opinion, increase light and noise pollution in its vicinity. This would affect both current local residents and existing wildlife.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse environmental impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15588801 / Elizabeth Adams</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36</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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POLICY A36: Hotel, Guildford Road

The Thatcher’s Hotel is something of a landmark in East Horsley and to those who pass through.

Policy D3: Historic Environment of the draft plan states that

“Guildford borough’s historic environment is intrinsically part of what makes Guildford the place it is, that it acknowledges the wider social, cultural, economic and environmental benefits that conservation can bring to our community and that it will conserve and enhance the historic environment in a manner appropriate to its significance.”

It further states that:

“Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question.”

I OBJECT to this policy as I believe that The Thatcher Hotel is part of this historic environment and that this policy runs contrary to Policy D3.

Furthermore Policy E6: The leisure and visitor experience. States:

“The loss of existing visitor, leisure and cultural attractions, including arts and entertainment facilities, hotels and indoor sports venues, will be strongly resisted unless replacement facilities of an equivalent or better standard and provision are proposed in a location equally accessible to the facility’s current catchment area.”

The Thatcher Hotel attracts visitors to the area by providing accommodation and restaurant facilities. It also caters for those wishing to hold receptions, parties etc. by providing rooms for this sort of thing. Therefore it is surely a visitor attraction. forth.

Therefore I OBJECT to this policy as it runs contrary to Policy E6
Furthermore the density of houses proposed for this site (37 dph) is much higher than currently exists within East Horsley (8.1 dph). According to the local parish council the highest density found locally to the proposed site is 13 dwellings per hectare.

The proposed dph is therefore approximately 5 times the average in the village, which I think is very high for this location. Thus, I OBJECT to Policy A36 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6328  Respondent: 15588801 / Elizabeth Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objection follows on from my comments above in the section “Policy P2: Green Belt, b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley”.

The proposed housing development of 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North is dependent upon the proposed western movement of the settlement boundary needed to bring this site within the settlement area.

It is clear from the NPPF that there must be ‘exceptional circumstances’ to justify any movement in settlement boundaries. This policy fails to demonstrate any such circumstances. Thus it is not justified and contrary to NPPF rules. Therefore in my view this site remains a part of the Metropolitan Green Belt and the housing development proposal should be considered invalid.

I OBJECT to Policy A39 as it fails to demonstrate the exceptional circumstances required to move the settlement boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13174  Respondent: 15588801 / Elizabeth Adams  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): ()
Policies 11, 12 and 13

There are serious deficiencies and shortcomings in the current infrastructure of East and West Horsley. This includes schools, roads, medical facilities. There have been complaints made to both county and local councils and it is a common subject on the local social media site.

GBC’s proposed housing policy in the Local Plan (see my comments on Policy S1 above) can only make this problem worse.

Specific current problems are:

- Potholed roads.
- The principal through roads are narrow with a number of pinch points where it is difficult for vehicles to pass one another. This is exacerbated by the increasing numbers of large vehicles such as HGVs using them.
- The principal roads struggle to cope with current levels of traffic at times. Particularly:
  - The roads are used by schoolchildren to cycle to & from school. Any increase in traffic volumes without improvement in the infrastructure will increasingly put them at risk.
- 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. Once again schoolchildren walk along these narrow pavements and as for cycling above they will be in increased danger.
- There are also sections with no or narrow pavements and which are poorly lit.
- Drainage is in poor condition with blocked drains giving rise to streams of water running down the roads and frequent surface water flooding when it rains.
- There are insufficient school spaces for the number of local children needing them.
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

Regarding East Horsley I could find only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. This says that funding will, at least in part, come from developer contribution. Funding is needed now to sort out the current problems. Any words about future funds from as yet to be agreed developments is, quite frankly, pie in the sky.

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan. The centre is already at capacity. There are a large number of retired & elderly people in The Horsleys. Therefore this problem will only get worse. Expansion is therefore needed now!

Local primary schooling is also a major issue. There is only one primary school in The Horsleys which is, I believe, operating at or near capacity. East Horsley Parish Council has raised this with you in its objections. The developments proposed in the plan will increase the number of children in the area but there is no provision for any more schooling in The Horsleys.

The proposed developments in The Horsleys and Wisley will put further strain on the other parts of the existing infrastructure, increasing traffic, patient numbers, and so on. Thus existing problems will be exacerbated. There are no proposals to solve these or at least to improve the situation.

I OBJECT to the infrastructure proposals as they fail to address the existing problems with the infrastructure.

I OBJECT to the infrastructure proposals because they do not meet the stated objective of providing infrastructure to support the proposed developments set out in the Site Policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13173  Respondent: 15588801 / Elizabeth Adams  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt

This policy states that GBC “will continue to protect the Metropolitan Green Belt”.

Authorities are permitted to make allowance for factors which may constrain the delivery of new housing under NPPF rules, including protecting the Metropolitan Green Belt and the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’). However I cannot find anywhere any reduction in GBC’s housing target to take account of such constraints.

GBC seems therefore to ignore its own Policy P2 through the housing policies that it has set out in the Local Plan. I understand that the analysis included in the Appendix of the draft local plan shows that around 65% of the developments proposed are to be built on land currently within the Metropolitan Green Belt. This is contrary to the GBC Policy P2 statement to protect the Green Belt.

I believe that GBC has incorrectly interpreted para 83 to 87 of NPPF. There are a number of references I have found which comment on the fact that green belt boundaries should be altered only “in exceptional circumstances”

- Para 83 clearly states green belt boundaries should be altered only "in exceptional circumstances".
- Ministerial Guidance on the Green Belt (reference Brandon Lewis MP and Nick Bowls MP 17/1/14 and 18/6/14 respectively) shows unmet housing need alone is not likely to qualify as exceptional circumstances.
- Sir Eric Pickles when Secretary of State for Communities and Local Government drew attention to the NPPF which states that the Green Belt may be altered ‘…only in exceptional circumstances…’.
- Sir Paul Beresford, MP for Mole Valley constituency, commented that “we see in the NPPF that Green Belt protection is specifically cited as a consideration which would override the need to meet housing targets. This is a clear statement of government policy.”

There is a tremendous strength of feeling by local people against the way in which GBC is proposing to implement its Green Belt policy. Local social media is awash with complaints about it. Anyone driving along the local lanes will see a large number of notice boards along the roadsides protesting about it. It can also be gauged from the thousands of letters sent protesting about the previous draft plan and the various past and ongoing campaigns being waged by locals against GBC’s initiatives. This policy is hardly “empowering local people to shape their surroundings” as set out in NFPP para 17.

Thus I OBJECT to this policy as set out in the draft local plan for the following reasons:

- The policy is inconsistent with itself
- It runs counter to the NPPF guidelines.
- It runs counter to Ministerial and Governmental guidance.
- It is against the wishes of the local people and thus runs contrary to NPPF para 17.

In addition I OBJECT to the following paragraphs within this policy.

1. a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

East Horsley is a rural village. Its Green Belt status has been a key factor in preserving its character. Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today.

GBC seems to be saying in paragraph 4.3.12 that East Horsley is not an open village and therefore be inset. I would contest this.
East Horsley Parish Council says; “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.”

Anyone who has come to East Horsley would recognise that this gives the village an open character which contributes to the open nature of the Green Belt.

In addition NPPF paragraph 17 specifically states that planning should be about “empowering local people to shape their surroundings”. Notice boards by the side of our local roads and comments on local social media sites plus the views of village inhabitants lead me to conclude that the proposed policy does not shape the surroundings in the way local people would wish. This is re-enforced by the number of responses received by GBC regarding the former iteration of the draft local plan. I believe this was around 20,000 most of which were opposed to it.

I can see no facts or arguments within P2 to support GBC’s argument to inset East Horsley from the Green Belt. Nor do I believe it meets NPPF para 17.

I OBJECT therefore to this policy.

1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC proposes a number of changes to the settlement boundaries of East Horsley which expand its settlement area.

The NPPF is clear that any change to settlement boundaries must be justified by ‘exceptional circumstances’.

GBC states in this paragraph that such “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”. GBC justifies these changes in the settlement boundaries in order to meet unfulfilled housing need in the borough in the Green Belt & Countryside Study and its accompanying Topic Paper.

However, NPPF Para 83 makes it clear that such an “unfulfilled housing need” alone is not likely to qualify as exceptional circumstances.

Therefore I OBJECT therefore to this policy.

1. c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

The only justification for this proposal, and its related planned development of over 2000 dwelling thereon, appears to be to meet an unfulfilled housing need.

The NPPF does not considered unmet housing need to be an exceptional circumstance.

This proposal also runs counter to the Council’s own planning officers’ recommendation. Indeed GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that:

*It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

This proposal would open the door to the development stated in Policy Site A35 of the draft plan. It would be little short of catastrophic for the local villages, including East and West Horsley, Ripley and Ockham. I have commented further on this matter under Site A35 below.

NPPF paragraph 17 specifically states that planning should be about “empowering local people to shape their surroundings”. The wishes of local people are very much against this proposal as can be deduced from the very many letters GBC received in protest to it in 2015. I am sure they can provide you with the number.
I OBJECT to the proposal to remove Wisley Airfield from the Green Belt as it runs contrary to the NPPF and specifically paragraphs 17 and 83.

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>PSLPP16/13172</th>
<th>Respondent:</th>
<th>15588801 / Elizabeth Adams</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy S2: Borough Wide Strategy**

I OBJECT to this policy as I believe the figures used to calculate GBC’s annual housing target are incorrect.

The policy is based upon a projected net increase of 25% in the housing stock of Guildford Borough over the period 2013-2033.

However the Office of National Statistics (ONS) projects a 15% increase in population over the same period.

In addition the West Surrey Strategic Housing Market Assessment, (“SHMA”), seems to be based on miscalculation. It estimates that 517 homes per annum arise from ‘the demographic starting point’. This is effectively what (ONS) and the Department of Communities and Local Government (“DCLG”) predict GBC will require based upon their population and household forecasts. It then adds

- 120 homes per annum in order to ‘support economic growth’
- 31 homes per annum to ‘improve affordability’ and
- 25 homes per annum due to ‘student growth’

This increases the original per annum figure of 517 new homes by 176 to reach the 693 annual housing target.

I would have thought that economic growth is already factored into the statistics produced by ONS and DCLG.

Further the GBC Affordable Housing Policy H2 proposes that all but the very smallest development sites must have 40% of their homes offered as affordable housing. Surely these would already be included in the 517 homes proposed.

It appears therefore that what GBC is proposing is actually in excess of the official household growth forecasts for the borough.

Furthermore I believe that the annual target needs to be recalculated in view of the decision of the UK to leave the EU. Both the government and Bank of England forecast that economic growth will be reduced. This must bring into question the number of homes added to the ONS/DCLG figures.

The National Planning Policy Framework (NPPF), paragraph 158, requires GBC to base its development plan policies on up-to-date and relevant evidence. I believe it can be seen from the above that this is not the case.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a resident of this Parish for some considerable years, I wish to present my objection in the strongest terms to GBC latest proposed submission which will undoubtedly affect the allocation of land both south of Normandy and North of Flexford for the future.

My objections are based upon common sense which the council has failed to recognise in any of their proposals.

1. We cannot take any further building works in such a small area of green belt land which had previously been promised as being safeguarded.
2. The infrastructure will not be able to absorb additional traffic
3. Building works on the land will result in more flooding to present home owners despite the reassurance of the planners
4. In addition to the incredible number of extra dwellings proposed where are the children going to go to school because the existing ones are already over capacity in numbers.
5. The rural aspect of Normandy & Flexford will be totally removed and it will become yet another sprawling housing estate which it was never intended for.
6. Our doctors surgeries would not be able to take on any additional patients, which would put more strain on the service they already provide.

In the past the village has lost a post office; butchers, garage/petrol station x 2, village stores x 2.
Planning consent is given to all and sundry which have already changed the persona of the village and yet when individual house owners apply for permission to extend their homes, they are more often than not rejected on the basis that it is not in keeping with the area.

WHY CAN OTHER PROPOSALS SUCH AS THIS LATEST ONE BE EVEN CONSIDERED. Is it for the financial gain for some people and or departments?

The personnel who make these decisions I am sure do not live in this community and will not feel the terrible affect it will have on our community.

PLEASE LET US WORK TOGETHER TO BRING BACK THE COMMUNITY SPIRIT AND ALLOW THE EXISTING OCCUPANTS MAKE OUR VILLAGE AND SURROUNDING AREAS A PLACE WE CAN ALL BE PROUD OF AND NOT JUST ANOTHER MONEY MAKING EXERCISE FOR DEVELOPERS ETC.

We elect our local councillors and politicians to work on our behalf and I am afraid that you are failing to meet our expectations

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 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, roads, sewerage and doctors, etc. are already at or close to capacity, without an infrastructure plan the proposals are simply unsustainable and are therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6337  Respondent: 15588897 / John Attridge  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): ()

and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. As mentioned, there are no exceptional circumstances which allow for it’s 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 previously developed land, but Guildford Borough Council have removed a brownfield site at Burnt Common and 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: PSLPP16/13218  Respondent: 15588897 / John Attridge  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 doubles the built area locally 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: PSLPP16/13199  Respondent: 15588897 / John Attridge  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 II)

There is already too much traffic in our villages. At present the morning traffic can back up the Portsmouth Road for over a mile from the centre of Ripley Village, simply because a school bus is trying to turn left into Newark Priory Avenue. This then has a knock on effect of tail backs down Send Marsh Road as far as the Saddler’s Arms and beyond. Further, congestion on the A3 often causes drivers to use the Portsmouth Road as a ‘rat run’, resulting in additional tail backs. The proposed housing plan for this area could put at least another 5000 cars on the road in the morning, which is simply not sustainable. Without adequate plans for improving road and transport infrastructure, the area is simply going to become gridlocked.

The A3 and M25 need to be improved before any development is considered. Highways England has no plans to even start considering improving the A3 before 2020. The recent opening of the Hindhead Tunnel on the A3 has noticeably increased the flow of traffic in this area, which now daily backs up from the M25 towards Guildford. So the area is already highly congested. 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 until they are.

1. I object on the grounds of poor air quality

The increased congestion that will result from the plan will inevitably reduce air quality. I am an asthmatic and suffer from severe chest infections about twice a year, which I am now suspecting is related to poor air quality in this area, which is not helped by living close to the A3 and M25. As mentioned, the huge developments being proposed, particularly in the north east of the borough, will inevitably lead to considerable further congestion and to even greater levels of air pollution, which can only have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I strongly object to the plan proposing to remove 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 that will result. As far as I am aware, there are no exceptional circumstances for these villages and sites being removed from the Green Belt, as is required by the National Planning Policy.</td>
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<td>The Plan does not appear to take adequate account of flood risk, as is required by National Planning Policy. It is well known that housing leads to additional risks from flooding, as rainfall is directed towards inadequate sewer systems rather than soaking into soil. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.</td>
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The number of houses planned will damage local communities through over development, especially Ripley, Send and Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, which was exemplified by my sons’ being unable to rely on buses to get into school on time. This means each adult will have to use a car, which will put a large number of extra cars on an already overcrowded and inadequate road infrastructure (see 3 below), which the plan does not appear to be addressing around Garlick’s Arch.

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.
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.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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: PSLPS16/6346  Respondent: 15588929 / Alex Hutchings  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 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of
Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13256  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3

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: PSLPP16/13259  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13220  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13265  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13251  Respondent: 15588929 / Alex Hutchings  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale 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: PSLP16/13263  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Do you consider this section of 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**

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 likely 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?**
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:

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.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

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: PSLPP16/13216  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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:

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Comment ID: PSLPP16/13205  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

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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Comment ID: SQLP16/1551  Respondent: 15588929 / Alex Hutchings  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?
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 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.
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: SQLP16/1557  Respondent: 15588929 / Alex Hutchings  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:

I am writing with regard to the Draft Local Plan for the Guildford Borough, with particular concern for the proposed changes in East and West Horsley. I object to all policies which include development of land situated on the green belt. I believe that the land on the green belt should be preserved for future generations and we should not opt to destroy it before fully examining the consequences and how this will affect the environment in the future.

Recently, I have been learning about brownfield and greenfield sites in my geography lessons at school and I have come to the conclusion that there are plenty of derelict brownfield sites which need redevelopment in the inner city and central business district. This land already has foundations built into it and the infrastructure surrounding it is much more advanced. For example, there are sufficient road networks that are able to deal with an increase in population within that area. Consequently, this would fulfil the need for more housing but leave the green belt untouched. This land is currently neglected and many declining businesses would welcome new residents, giving a purpose to the land.

The original purpose of the green belt was to prevent urban sprawl so that the environment is protected in rural areas, this has resulted in many more benefits. For example, air quality is improved in both rural and urban areas, nature is successfully conserved, and the unique landscape is protected in many rural areas. So then, what are the benefits of destroying this policy? I would argue that yes, this is a very straight-forward way to provide housing for those who need it, however, where will we draw the line? This development can only be temporary and before long, more housing will be needed and therefore more of the green belt will be destroyed. This completely defeats the objective of the green belt and I believe that to prevent this development leading to a slippery slope we must not go ahead with the local plan.

I have noticed on the Guildford Borough Council website that one of the aims of this local plan is to 'protect our most important countryside, landscapes and heritage' however I am at a loss as to how this can be claimed whilst at the same time, both of the Horsleys are to be removed from the green belt altogether along with many other villages in Surrey. The green belt policy was made with thought and consideration, it provides protection for the environment and is often what defines the historic status of many English villages. Therefore I ask you to rethink the plans which have been put forward and what would be best for the country in the long term.

I leave you with my objections, and ask you to remember that building upon the green belt is an irreversible process and therefore more time and effort needs to be put into finding other areas which would be more suitable for fulfilling the needs of the British population, a plan in which both those who need homes and those who are already homed are satisfied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPA16/3219  Respondent: 15589249 / E B Hutchins  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 add my name to the countless others (I suspect) who are unhappy with your plans for our neighbourhood.  

1. I object to the proposal to remove us from the Green Belt.  
2. I'm unsure of the reasons why you propose to change either boundaries.  
3. Our infrastructure is not suitable, at present for any additional pressure to add to the area is, road routes, schools, surgery practise are already over stretched, no improvement mentioned of these important needs for the community.  
4. Wisley Airfield, the impact again of the locality would be enormous for the surrounding area and beyond, the same applies to Burnt Common, also.  
5. Thatchers Hotel is the nearest proposed site to where I live and I'm concerned about the road system, already a bad bend and lots of entrances and exits to contend with.  

I moved here originally for the quiet, peaceful neighbourhood and I would hate to see that ruined for future generations therefore I feel it's important to add my voice to those who are very unhappy with your proposed proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/6355  Respondent: 15589281 / Frances Warne  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 are writing to strongly object to the large development being proposed in the GBC Local Plan on Site A46 for over 1100 houses and a secondary school on 67 hectares of green belt land in Normandy and Flexford.

It is stated in this revised proposed local plan that this land could be removed from the green belt due to ‘exceptional circumstances’, but these have not been demonstrated by GBC. We believe this is a completely developer-led proposal, with Taylor Wimpey offering to provide a school as a sweetener if they can develop the land. However, there is no evidence to prove there is a need for an extra school in the area; two schools within 3 and 5 miles of the site are undersubscribed which, together with the proposed new UTC which is to be opened in 2017/18, should negate the need for a new school in Normandy.

Site A46 is not a suitable site for a school or for the large-scale development proposed. The minor C and D class roads which would serve them are completely inadequate and unsuitable to carry the inevitable vast increase in traffic from the new householders travelling to and from the development and from parents dropping off and picking up their children from
school. There is a height restriction at the railway bridge in Westwood Lane, and the bridge over the railway at Glaziers Lane has a bend at its blind apex, making this a dangerous section of road. It is a common occurrence when driving over the bridge to meet oncoming vehicles on the wrong side of the white line.

Even though GBC envisage that many children will be using the train or cycling to school, this is unlikely as most parents will opt to drive their children due to safety reasons. It would be extremely hazardous for children to cycle on the roads given the volume of traffic on all of the surrounding roads in the area and the width of Glaziers Lane. In addition, Glaziers Lane is used extensively by heavy lorries, more often than not exceeding the 30 mph speed limit, using Glaziers Lane as a route between the A3 or A31 and the Aldershot Road. It is difficult to see how any road improvements could be made to these local lanes to improve traffic flow for the future and we do not think this has been considered fully when suggesting this site for development.

It is not unusual for a journey during rush hour (from around 7 am) from Normandy to Guildford to take 40 minutes to an hour due to the volume of traffic whether using the A31, A3 or A323. The increase in traffic created by the new development and school would inevitably lead to more road chaos and have the effect of extending traffic congestion to include the whole area of Normandy and Flexford in addition to the daily queues at the top of Wanborough Hill and junctions with the Aldershot Road during rush hour. With the increase in traffic, it is also likely there will be more serious and fatal road accidents particularly at the dangerous road junctions where Glaziers Lane and Westwood Lane meet the A323.

Whilst we understand the need for new homes, we feel any new developments should be built in small pockets of land, by infilling and using brownfield sites, preferably with all towns and villages of Surrey bearing an equitable quota of new housing. To centre such a large development between our two small settlements of Flexford and Normandy will decimate a very special area of countryside which is one of only a few truly rural open and accessible spaces remaining in the ever expanding urban sprawl of the borough.

In an interview with Sir Andrew Motion (April 2015) the Prime Minister stated

“Green belt land is extremely precious. Protecting the lungs around our cities is paramount for me. I am very clear about that – as is our National Planning Policy framework. This framework compels local councils to develop Local Plans, protecting not just the green belt but any other important areas of green space. The Local Plan sets out where things get built or not. The combination of the National Planning Policy Framework and the Local Plans provide strong protections against green belt development. **Councils are exempt from meeting local housing need if constraints like green belt make it impossible.**”

The land between Normandy and Flexford provides an extremely precious green lung amongst the built up areas of Ash, Tongham and Guildford. The proposed area of land includes a wide variety of habitats – ancient woodland, streams, prime arable and pastoral land with field margins lined by many mature trees and hedgerows.

Should this development on green belt land be allowed to go ahead, there would be a devastating and irreversible loss of wildlife as the land in question supports many species of birds, animals, trees and plants. The rural aspect of Flexford and Normandy has attracted new wildlife to the area in recent years, for example red kites and buzzards have also become daily sightings. We commonly see deer, foxes, hedgehogs and bats, and see and hear many birds such as skylarks, whitethroats, blackcaps, yellowhammers, and fieldfares and redwings in addition to the more common or garden birds on the proposed site. Although some of these are not protected species, it is an indication of how rich our village’s rural environment is.

It would be wrong to destroy this beautiful rural area to simply provide an easy route to enable the borough to meet a substantial quota of housing target with one large development rather than identifying more suitable brownfield sites and smaller sites for more widespread but fairer developments. If it is allowed to proceed it will completely annihilate 67 hectares of precious countryside, devastate a thriving population of wildlife and take away the very essence of our village.

We hope that our objection and comments will be taken into consideration by the planning committee.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPA16/3221  Respondent: 15589313 / Ilona Briant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (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): ()

New Version of Guildford Local Plan – Objection to Shalford Green Belt/ Settlement Boundary

Please register my objection to the above plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3222  Respondent: 15589345 / Matt Cornwell  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): ()

Objection to Guildford Borough Council Draft Local Plan (June 2016)

I am a student who currently lives in West Horsley and am deeply concerned by the proposed plans and the effect these will have on not only my generation, but generations to come. I am objecting to this plan on a number of grounds which take into account social, economic and environmental aspects; all of which in my opinion will be hugely detrimental to the areas around Guildford and their peoples.

1. **Green Belt**
   - “The green is a policy for controlling urban growth. The idea is for a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail.” It is an area which is only able to be removed in ‘exceptional circumstances’ and it is clear that such circumstances have not been met. The green belt is crucial for the local area in providing such facilities but also for the local ecosystems. Such developments will destroy habitats of local species and the removal of species could potentially lead to trophic cascade- which will be extremely damaging to the area, highlighting the environmental damage. In the long run it is more than likely the local economy will be damaged as a result.
   - Therefore the Horsleys must remain in the green belt and I object to the proposal to take them and the Former Wisley airfield (Three Farm Meadows) out of the green belt.

1. **Congestion and Public Transport**
   - Having used the local train services for the last 7 years, it is evident that the service provided is not adequate. Trains are often overcrowded and prices are already too high. With the thousands of houses being built this
service will only get worse. Prices will rise to fund “improvements” and services will become even more overcrowded. As a student, public transport is crucial for me to get around and with increased demand for these services there is little evidence to suggest they will cope, pointing only to extreme difficulties. I can’t stress enough how important an efficient and sufficient public transport system is for the local economy.

- Similarly the roads around the area of the proposed sites will not be able to cope. Many of the sites are in areas where single track roads are extremely common and any improvements in these will lead to further damage to the ecosystem. However, more importantly, the A3 will not be able to cope. It already struggles and with thousands of more cars in the area there can only be negative consequences. Increased journey times and congestion will mean increased costs to business and could affect locals’ ability to have jobs further away from their homes. There is no sufficient plan as to how the area will cope and this worries me for my future.

1. Infrastructure and Local services

- The proposed increase of up to 35% in existing West Horsley is greater than any other single area in the Borough. The proposals for West Horsley are unbalanced and unsustainable and would change the character of the village forever. I object to this. Such character is what attracts people to the area and enables local businesses to thrive.

The local infrastructure would not be able to cope and I cannot see any circumstance in which one can argue that it will firstly, be sufficient and secondly, have a positive effect on the area.

Schools are full, drainage systems are struggling and medical facilities are stretched.

These are only a few of the many issues these plans will create and highlight to me that there has not been sufficient research on the consequences, as anyone with common sense and an understanding of the area would realise that what has been proposed is utterly ludicrous.

As a young individual it angers me how these plans can be proposed and I am worried for the future and sustainability of an area I love living in and hope to do so in time to come.

Further to this, it worries me how little information there is on these plans. Having spoken to my peers many are unaware of what is going on. These peers of mine will be most affected by what is proposed. There needs to be more information for the younger generation without a doubt, the plan is not accessible to people in my age group and needs to be. The fact little information is being pushed towards those of my age and younger shows that something other than the future for our generation is more important.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to changes to the Draft Local Plan.

I object to the fact that there has been NO change to the insetting of West and East Horsley from the Green Belt

I object to site A35 Three Farm Meadows still being included in the Local Plan and that it hasn't been removed despite the thousands of objections from both residents and consultees

The site is next to an extremely busy stretch of road and close to the very congested Junction 10 of the M25. Plans for improving the road do not take into account any development and the road system would not be able to cope

It is also next to the very popular RHS Wisley which has thousands of visitors a year and the effect of this traffic has not been considered

The site is not near any railway station so travel on the local roads would cause huge disruption and congestion. Other sites are much nearer train stations

There is no public transport and any suggested would have to negotiate the local narrow roads. Sustainable transport would not be possible as they would not be safe

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.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

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>PSLPA16/3229</th>
<th>Respondent:</th>
<th>15589665 / Anna Worsley</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</table>
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: PSLPA16/3230 Respondent: 15589665 / Anna Worsley 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: PSLPS16/6363 Respondent: 15589665 / Anna Worsley 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): ()

<table>
<thead>
<tr>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.</td>
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<tr>
<td>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.</td>
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<tr>
<td>Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.</td>
</tr>
<tr>
<td>There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.</td>
</tr>
<tr>
<td>Electricity supply is also inadequate and would require a big infrastructure development.</td>
</tr>
<tr>
<td>The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.</td>
</tr>
<tr>
<td>The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.</td>
</tr>
</tbody>
</table>
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: PSLPS16/6365</th>
<th>Respondent: 15589665 / Anna Worsley</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 Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPS16/6366 | Respondent: 15589665 / Anna Worsley | 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: PSLPP16/13289 | Respondent: 15589665 / Anna Worsley | 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:** PSLPP16/13286  **Respondent:** 15589665 / Anna Worsley  **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:** PSLPP16/13287  **Respondent:** 15589665 / Anna Worsley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)**

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/13288</th>
<th>Respondent: 15589665 / Anna Worsley</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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2. **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>Respondent: 15589665 / Anna Worsley</th>
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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): ( )**
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: PSLPP16/13293  Respondent: 15589665 / Anna Worsley  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-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: PSLPP16/13294  Respondent: 15589665 / Anna Worsley  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: PSLPP16/13290  Respondent: 15589665 / Anna Worsley  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:
### 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:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13292</th>
<th>Respondent: 15589665 / Anna Worsley</th>
<th>Agent:</th>
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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):** ()

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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<tr>
<th>Comment ID: PSLPP16/13283</th>
<th>Respondent: 15589665 / Anna Worsley</th>
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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1651

Page 1651 of 1920
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.

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:
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: PSLPP16/13285  Respondent: 15589665 / Anna Worsley  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 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:
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am objecting to the proposed development of Gosden Hill Farm. I believe the plans to be unsound as there does not seem to be enough access to the A3 planned, ie, north and south slip roads.

The resulting excess traffic will have to travel through Burpham (a residential area) which is already struggling with a huge amount of cars trying 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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<th>Comment ID: PSLP16/13297</th>
<th>Respondent: 15589825 / Ann Stewart</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Re the plans, I am writing to say that I support the GRA’s response in objecting to the expansion of Guildford by 25% - a ridiculously high percentage which will spoil/ruin the character of the town.

In particular I object to:

- plans to use green belt land when there are brownfield sites available especially in the centre - people do not want to live in a town totally given over to retail.

- a lack of proper sustainable transport exacerbated by an excessive number of new homes creating yet more and more vehicles on already crowded roads

- These plans strike me as ones developed by businesses likely to benefit - construction etc etc and not for the people of Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: PSLPA16/3231</th>
<th>Respondent: 15589857 / Louise Herbert</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon</td>
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I object to the Settlement Boundary, which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside the settlement boundary (Policy P2 para 4.3.25) and is therefore considered as being unnecessary in an already tightly developed ancient and rural conservation village. I therefore ask that this proposal be removed as it risks endangering the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1), and the character of East Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13317  Respondent: 15589857 / Louise Herbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development with the resulting increase in traffic, and additional unacceptable pressure on infrastructure. I object in particular to the insetting of West Clandon, Send, West Horsley and East Horsley. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13302  Respondent: 15589857 / Louise Herbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns to be developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough, which unfairly target our tranquil rural villages on the basis they can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing. Some 65% of the housing proposed is on Green Belt, with little consideration being given to redevelopment of brown field sites for housing.
I object to GBC’s contravention of 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.” GBC has not proven any special circumstance for development on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13305  Respondent: 15589857 / Louise Herbert  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 not offering sustainable development as regards roads and rail infrastructure, which does not even cope with current demand. There is already significant congestion on the A3 in particular, and 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 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.

I specifically draw to your attention the winding, narrow, dangerous and congested route via the A247 through West Clandon, which then encourages drivers to seek and use the even narrower rural Ripley Road, through East Clandon, to and from the A3. This will be much exacerbated with the proposed large increase in housing resulting in associated large increases in cars and travel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13307  Respondent: 15589857 / Louise Herbert  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): ()

Continuing with Policy S1 (Presumption in favour of Sustainable Development)

I object to the Plan on the basis that this Policy is not being adhered to. It is clear that there are no fixed plans to improve the provision of services. If GBC is serious about improving the infrastructure and sustainability of our communities, it 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.

I object to the fact that GBC has 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. Here in East Clandon, we have not had a meaningful consultation on imposing a settlement boundary on East Clandon, nor have we been consulted on meaningful economic and population growth figures for Guildford showing various projections with high, medium and low growth scenarios.

There should be a significant challenge and review of GBC scenario planning with the housing and growth numbers revised, especially in the light of uncertainty and change, which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13298</th>
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I write to formally object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and will be of even greater detriment to our neighbouring villages of West Clandon, Ripley, West Horsley 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.

- I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds: Firstly these housing numbers have been imposed 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 on which there was no consultation. This policy and its excessive housing forecasts will turn Guildford into a dormitory town for 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: PSLPP16/13299</th>
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Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/3235  | Respondent: | 15589889 / Keith Macdonald  | 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:

| Comment ID: | PSLPA16/3236  | Respondent: | 15589889 / Keith 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): ()

- 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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The land in Gosden Hill does exactly what the Greenbelt was designed to achieve: it provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land, all requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery and schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour onto the A3 which is already stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day, and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could do virtually whatever it wants. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley. If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime, given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and roads like the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill with which health and safety issues are associated. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6369  Respondent: 15589889 / Keith Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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 make the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of
Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments with sustainable transport. With ever reducing bus services in the area and no railway station within reasonable walking distance, it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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, incidentally, includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is, in the scheme of industrial development, relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/13308  Respondent: 15589889 / Keith Macdonald 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: PSLPP16/13311  Respondent: 15589889 / Keith Macdonald Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four already existing successful rural businesses which have been in existence for over 30 years plus a further two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in the town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I OBJECT to the congestion that the proposed 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. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow, only being wide enough for one vehicle at a time. The main “pinch point” on The Street in West Clandon is a case in point: lorries travelling in opposite directions cannot pass each other and, when faced with a lorry, even cars need to mount the pavement to get past. In addition, the road surfaces are in a poor condition.

I OBJECT most vigorously to the development proposed in the local plan which will result in more traffic using these narrow roads leading to further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever more popular pastime, particularly at weekends, with hundreds of cyclists passing through the local villages on their way to the Surrey Hills. With no proper cycle lanes on the narrow roads surrounding the villages, and with greater vehicle traffic being generated from these developments, there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk of injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements as mentioned above.

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. Without plans to improve these services there should be no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send, will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services even further and is unsustainable.

There is no provision made for what will be the necessary increase in capacity of the Royal Surrey Hospital, Guildford. Where is this assessed and how will it be remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT 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: PSLPP16/13320  Respondent: 15589889 / Keith Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough, will lead to considerable further congestion despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13303  Respondent: 15589889 / Keith Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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 the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with the sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires that there be an exceptional circumstance for the Green Belt boundaries to be altered, as for any development on the Green Belt. There are no exceptional circumstances for these villages as mere housing need does not constitute a ‘special circumstance’ for encroachment on the Green Belt. Once taken, the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt would result in urban sprawl and the neighbouring villages merging together. The significant development proposed for these villages will result in the character of these villages being completely lost and the surrounding countryside encroached upon. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13304  Respondent: 15589889 / Keith Macdonald  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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 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, especially for the villages between Guildford and the M25, including Ripley, Send and West Clandon. Not only will the services in these villages be unable to cope with the level of development proposed, the proposed developments themselves do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are constantly being reduced. Residents will have no option but to rely on their cars. These sites are totally unsuitable due to being unable to access sustainable transport. Furthermore, the Infrastructure Plan shows no plans to improve the infrastructure for Garlick’s Arch. Residents will have to rely on their cars for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical and sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from significant congestion. Further vehicle movements will only result in ever more acute congestion and increased pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13301  Respondent: 15589889 / Keith Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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 more 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. All of these lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial and so, therefore, are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites of over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no 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:
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:

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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
- 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:
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: PSLPP16/13362  Respondent: 15590241 / Claire Tallis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13365  Respondent: 15590241 / Claire Tallis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people 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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Comment ID: PSLPP16/13359  Respondent: 15590241 / Claire Tallis  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 due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13367  Respondent: 15590241 / Claire Tallis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13371  Respondent: 15590241 / Claire Tallis  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: PSLPP16/13363  Respondent: 15590241 / Claire Tallis  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?
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:

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: PSLPP16/13355  Respondent: 15590241 / Claire Tallis  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).

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)

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:

Comment ID: PSLPP16/13361  Respondent: 15590241 / Claire Tallis  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I object to the Borough Wide Strategy (Policy S2)**

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

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?**
APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
• 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: PSLPA16/3259  Respondent: 15590273 / Eunja Madge  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number.
Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any 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: PSLPS16/6402   Respondent: 15590273 / Eunja Madge   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:**

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**Comment ID:** PSLPS16/6404  **Respondent:** 15590273 / Eunja Madge  **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 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:

Comment ID: PSLPP16/13382  Respondent: 15590273 / Eunja Madge  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 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: PSLPP16/13400  Respondent: 15590273 / Eunja Madge  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 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?
**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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**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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<th>Comment ID: PSLPP16/13378</th>
<th>Respondent: 15590273 / Eunja Madge</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 E2

I OBJECT to the location for new employment floor space (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?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13407  Respondent: 15590273 / Eunja Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13397  Respondent: 15590273 / Eunja Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion. The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13391  Respondent: 15590273 / Eunja Madge  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 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?

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<td>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): ()

**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:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/13405</th>
<th>Respondent:</th>
<th>15590273 / Eunja Madge</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>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

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:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1

I OBJECT, 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: PSLPP16/13387  Respondent: 15590273 / Eunja Madge  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

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: PSLPP16/13389  Respondent: 15590273 / Eunja Madge  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY ID3

I OBJECT to poor air quality concerns (Policy ID3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13372  Respondent: 15590273 / Eunja Madge  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 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: PSLPP16/13374  Respondent: 15590273 / Eunja Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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:**

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**Comment ID:** PSLPP16/13369  **Respondent:** 15590273 / Eunja Madge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

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.

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 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: SQLP16/1574  Respondent: 15590273 / Eunja Madge  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 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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<th>Comment ID: SQLP16/1576</th>
<th>Respondent: 15590273 / Eunja Madge</th>
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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?

Attached documents:

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<th>Comment ID: SQLP16/1578</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 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:

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Comment ID: SQLP16/1580  Respondent: 15590273 / Eunja Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3253  Respondent: 15590305 / Mike Riddiford  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 the UNSUSTAINABLE, based on FLAWED DATA
draft Local plan june 2016

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:

Comment ID: PSLPS16/6395  Respondent: 15590305 / Mike Riddiford  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): ()

No exceptional circumstances to allow Unneccessary Development have been shown by Borough Council to warrant the 2000 house and traveller sites being built on Gosden Hill Farm.Guildfords report on housing figures is UNSOUND,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13386  Respondent: 15590305 / Mike Riddiford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 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:

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Comment ID: PSLPA16/3265  Respondent: 15590401 / Bernard Jay  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 feel strongly about the proposed extra housing on our green belt in Normandy. The village not only has an old out dated sewer and water system that would not cope with the extra demands but other services are also overloaded.

This week I attempted to get an urgent appointment with my local doctor. To make things easier (I thought) I did not stipulate which of the two surgeries, Fairlands or Glaziers Lane, nor did I request a specific Doctor. Hoping this would speed the appointment.

THE EARLIEST WAS IN TWO WEEKS TIME. Please tell me how they would cope with all the extra housing.

Also, on a Sunday morning it is impossible to walk on the pavement by the church in Westwood Lane. Cars completely block the pavement for at least two hundred yards and pedestrians, including mothers with prams and others IN wheelchairs, have to move into the very narrow and dangerous road.

There is only one very small car park at the church hall insufficient for the needs of the local church goers now so what will happen when another two or three hundred cars want to park there?

Do you gave a response to this plan from the utility companies? Will they cope?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3266  Respondent: 15590433 / Debra Edwards  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 regarding the above and ask that the following comments be taken into account when considering the same.

I live in the village of West Horsley and therefore many of my comments relate to the specific issues relating to that village alone.

The Issue

I am aware of Central Government's desire to increase the UK's housing provision, particularly in the South East, and within this context Guildford Borough Council (GBC) is under pressure to adopt a deliverable Local Plan for the borough for the period until 2031 and with particular reference to housing provision.

Within this context, I believe that the extra housing provision in discussion should ideally be located on existing brownfield sites within the borough and be located as near as possible to the centres of employment. I do not believe that the current document has given sufficient consideration to this issue, seeking instead an over-reliance on the proposed utilisation of the currently designated Green Belt land around local villages, particularly to the east of the borough, to meet such needs.

In my opinion (and this is formulated through extensive research and professional advice taken) this is a fundamental flaw in the Guildford borough Submission Local Plan 2016 (Proposed Local Plan) as it proposes extensive residential development that will be remote from the existing centres of employment or where indicated within the Proposed Local Plan; these being largely on the opposite side of the borough. Such a policy would be counter to the principles of sustainable development and would undoubtedly put further pressure on the already struggling transport infrastructure. I would like to see this approach rejected and the bulk of new proposed housing allocated nearer to the existing and proposed centres of employment, i.e. within and around Guildford town centre / urban area, rather than in the borough’s outlying, and previously protected, villages.

But I also think that semi-rural villages in the borough, such as West Horsley should and be expected to bear some of the brunt of the future housing provision as it is necessary to increase the number of houses within the village, amongst other reasons, for the young to be able to stay within the village and the older residents to have the opportunity to downsize within the village, but any such housing provision must only be allocated having considered many factors, such as: environmental issues (inc Green Belt), housing needs, local character and architecture, transport and highway situations, infrastructure (schooling, doctors, cap parking in and around the village and at the rail stn, potn development sites amongst others.

I will therefore set out my views on each topic with regard to West Horsley below.

As a matter of government policy, soundness requires a plan to be:

- positively prepared;
- justified;
- effective;
- consistent with national policy.

Within these four heads it should enable, over its plan period, the delivery of sustainable development in accordance with the NPPF.

I have several strong concerns as to whether this is the case within the Proposed Local Plan, as currently drafted, and believe that some of the current policies are not justified nor consistent with national policy, thereby rendering the same unsound without significant revision.
I therefore **OBJECT** to the Guildford borough Proposed Submission Local Plan – Strategy & Sites 2016 as currently drafted.

**ENVIRONMENTAL ISSUES (INC. GREEN BELT)**

In my opinion, the Metropolitan Green Belt and its special natural environment is a defining characteristic of Guildford borough and, indeed, West Horsley.

I believe that there should remain a general presumption that it should be protected. The Green Belt should only be sacrificed as a last resort, as once lost it can never be reclaimed. Many many villages in Guildford borough are still threatened with removal from their long established Green Belt designation, including where I live, the village of West Horsley. Personally, I do not believe that West Horsley’s currently defined Settlement Area boundaries (ref. 2003 Local Plan) needs such a significant extension, as is being proposed, and perhaps only needs a smaller scale review. In this context, paragraph of Policy P2: Green Belt; is in my opinion so badly worded. For GBC to state “We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development” is not being represented at all in the way they are proposing removing so much of the Green Belt, and I do not agree with the proposals map and its proposed new Green Belt boundary.

The national policy regarding protection for the Green Belt is contained within section 9 of the NPPF. Paragraph 79 confirms that the Government attaches great importance to Green Belts.

The main and probably the most important aim of national Green Belt policy, which is repeated word for word by GBC in item 4.3.11, is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belt being its openness and permanence.

As the Green Belt in Surrey is long established and has detailed boundaries, “exceptional circumstances” must be demonstrated to necessitate the change to its boundaries. I do not believe that this Proposed Local Plan is an “exceptional circumstance”.

Paragraph 84 of the NPPF advises that “When drawing up or reviewing Green Belt boundaries 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”.

GBC states in item 4.3.12 that “national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt”.

I believe that West Horsley’s open, semi-rural character makes an important contribution to the openness of the Green Belt in this part of the borough. This is the specific and differentiating characteristic of West Horsley over its more ‘leafy’ and more tightly developed neighbour, East Horsley, which I believe GBC and its consultants have failed to recognise or protect.

It is a strong feeling that the semi-rural landscape character of the village is greatly valued by West Horsley residents and is detailed in general terms within the Guildford Borough Council Landscape Character Assessment.

A huge amount of the character of West Horsley is defined by the open views, (via paths, gates, farm entrance openings, bridle ways etc) from the roads either entering or passing through the village settlement.

Throughout the village, stretches of undeveloped countryside on just one side of Ockham Road North, then East Lane, Ripley Lane and Long Reasch, and also The Street boldly reinforce this characteristic. The clearly defined precedent is of the village settlement being on one side of the route and there being open vistas across fields and meadows and paddocks or into woodlands on the other. This should be protected not compromised by any developments.

Also the fact that the main traffic route through the village (along East Lane and The Street) currently benefits from a ‘green gap’ of woods and fields to the north (between The Rectory, roughly opposite Northcote Road to Grovelands Farm, beyond the railway bridge) and to the south (between Roundtree Farm and the listed Railway Cottages, at the Railway
bridge). This natural green area, centred on the Lollesworth Lane and Long Reach junction, is in many ways the real centre of the village.

Clearly Green Belt everywhere is under pressure, but in my opinion, I strongly feel that any linear extensions of the existing settlement boundaries should be strongly resisted.

I therefore believe that the parish of West Horsley’s open, semi-rural, character does indeed make clear and important contribution to the openness of the Green Belt, and therefore I believe that, under national planning policy it should remain “washed over by” the Green Belt, rather than being “inset from the Green Belt” as proposed.

Policy on development with the Metropolitan Green Belt is set out in paragraphs 79 – 92 of the NPPF.

Inappropriate development is, by definition, harmful to Green Belt and paragraph 87 of the NPPF clearly states that it “should not be approved except in very special circumstances”. Furthermore paragraph 89 advises local planning authorities to “regard the construction of new buildings as inappropriate in Green Belt”.

Whilst I accept that it is possible for a local planning authority to conduct a review of Green Belt land and consider redefining boundaries which add or take away Green Belt land in order to meet these “very special circumstances”, paragraph 83 of the NPPF states, “Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

This paragraph clearly sets out that a Green Belt review should only happen in “exceptional circumstances”. This idea is further explained on in paragraph 82 as being “for example when planning for larger scale development such as new settlements or major urban extensions”. The proposals for West Horsley are neither a NEW SETTLEMENT NOR A MAJOR URBAN EXTENSION.

I note that within item 4.3.16 GBC states that “We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and to promote sustainable patterns of development.” - in my opinion these are absolutely not EXCEPTIONAL CIRCUMSTANCES and therefore I am requesting that this sentence is removed.

I cannot see how GBC have directed sustainable development towards existing urban areas and also have not directed it next towards town and villages already inset with the Green Belt.

Removal of any land from the Green Belt should only be allowed after long and thoughtful consideration of the individual sites concerned. I fear that the proposed ‘wholesale’ removal from being “washed over by the Green Belt” to being “inset within the Green Belt” will forever change the nature of West Horsley and, once lost, the character of our village and many surrounding villages will be changed for the worse forever and will clearly be irreversible, which would be a tragic and very sad loss to West Horsley.

I am therefore OBJECTING to the proposals map and the proposed amendment of the Green Belt boundary around West Horsley in particular. I would ask that the proposals map be rejected, reconsidered and amended.

HOUSING NEED

The target house building programme proposed by GBC represents a 25% increase in the housing stock of the borough, whilst we have been advised that the Office of national Statistics (ONS) projects a population increase of some 15% for the borough of Guildford over the same period, I THEREFORE CANNOT SEE OR UNDERSTAND WHY GBC DEEMS IT SO NECESSARY TO INCREASE THE TARGET HOUSE BUILDING PROGRAMME BY A 25% INCREASE IN THE HOUSING STOCK OF THE BOROUGH.
Without a doubt the proposed increase in the number of new houses required has NOT been proven for the village of West Horsley. In my opinion the Proposed Submission Local Plan in respect of West Horsley is excessive in terms of the potential residential provision currently indicated.

I do not believe that the scale of development proposed, in any way, reflects the actual need, or that it respects the local character and existing built density of the village. But I do strongly feel the Horsleys (both East and West) should have new houses built for reasons already stated (PARTICULARLY FOR THE YOUNG AND OLD) but in a much less excessive way. The necessity for 385 new houses on the four proposed sites is grossly excessive.

The population of West Horsley is circa 2828 – to build 385 houses with an increasing family size per household according to new data from Eurostat (according to a Telegraph article of August 2015) stating that the average of 2.4 children is now growing and there are more four baby families now in Britain than almost all of Europe. If we assume that it is still only 2.4 children per family then 385 houses will equate to circa 1700 people – that is a 60% increase on the already existing population of West Horsley – I cannot comprehend the thought process of GBC if they actually want to increase the population of West Horsley by 60% - the village will quite literally just not be able to cope in anyway whatsoever. If the population was increased by 15-20% then it would be necessary to build circa 130 more houses or circa 33 per the four proposed sites, which would be so much more appropriate and within the desires of circa 95% of the Horsleys (East and West).

I therefore OBJECT to the current site allocation and housing densities proposed for all four sites in West Horsley.

I understand that in March 2014 the Government published a new web-based Planning Practise Guidance (Housing & economic land availability assessment, Methodology – stage 5: Final evidence base, 6 March 2014) to accompany and give further detail about the policies in the NPPF. This guidance set out that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify development within the Green Belt. It states “Unmet housing need 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”.

On 4th October 2014, I understand that the Government announced that it had updated its online Planning Practice Guidance. The aim of this was to reaffirm local authorities’ abilities to “safeguard their local area against urban sprawl, and to protect the green lungs around towns and cities”. The Government said that it wanted to make planning policy clear that housing need does not justify the harm done to the Green Belt by inappropriate development.

The new guidance read: “Do housing and economic needs override constraints on the use of land, such as Green Belt? - The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. 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 Green Belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

The Framework makes clear that, once established, Green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Do local planning authorities have to meet in full housing needs identified in needs assessments? – Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a
strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.”

On the 19 December 2014 the Planning Minister wrote to the Chief Executive at the Planning Inspectorate about Strategic Housing Market Assessments. This letter set out the relationship between housing figures produced as part of a Strategic Housing Market Assessment and those in a Local Plan and how to take into account constraints such as Green Belt land: “However, the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans.

It does not immediately or in itself invalidate housing numbers in existing Local Plans. Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there area environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement. They also need to consider whether there are opportunities to co-operate with neighbouring planning authorities to meet needs across housing market areas. Only after those considerations are complete will the council’s approach be tested at examination by an inspector. Clearly each council will need to work through this process to take account of particular local circumstances in responding to Strategic Housing Market Assessments”.

It is strongly of my opinion that the overall extent of development required in the borough necessary to meet the employment and housing needs in the borough, as set out in Policy S2, has not been satisfactorily defined having regard to the methodology summarised above.

The West Surrey Strategic Housing Market assessment (SHMA) assesses an Objectively Assessed Need (OAN) of 633 dwellings per annum “but does not take into account land supply or other constraints to development”, as per paragraph 1.2 of the Guildford Summary Report – October 2015. This figure is acknowledged as including upwards adjustments to support growth in student numbers and higher migration levels than are shown in the 2012-based Population Projections and represents an OAN 23% higher than need calculated through London sensitivity analysis, as per paragraphs 4.1 – 4.2 of the same Guildford summary Report.

Policy S2 of the Proposed Local Plan applies uncritically this OAN figure to identify a housing requirement of 13,860 dwellings for the plan period (20 years at 693 dwellings per annum). There is no evidence to indicate that in defining this figure GBC has undertaken a careful consideration of “whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement” and which indicate that development should be restricted.

In my opinion, the Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is simply NOT ADEQUATELY JUSTIFIED OR SUPPORTED WITH SOUND ARGUMENT OR TAKING INTO ACCOUNT GOVERNMENT POLICY REGARDING THE PROTECTION OF GREENBELT AND EXCEPTIONAL CIRCUMSTANCES.

Furthermore, I also understand that GBC will not release details of the methodology used by their third party consultants to arrive at the OAN figures used, which, in my opinion, also makes the likelihood of the Proposed Local Plan being considered unsound in this respect. Given that these OAN figures then play such a fundamental role in many of the Site and Strategy issues (and in particular Site Allocation) I believe that much of the Proposed Local Plan is very much open to challenge, possibly including judicial review.

A disproportionate burden of meeting what GBC has chosen to define as its development needs is also proposed to fall on the more rural east of the borough.
Within this eastern area, West Horsley is then allocated to bear an excessive proportion of this proposed development (as stated above, circa 60% increase of the population of West Horsley), despite the numerous countervailing reasons and objections put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to both senior and junior school places; medical facilities, parking availability at the station, etc.) If adopted, the draft plan will put an unsustainable pressure on all local resources and infrastructure.

I would further make the point that the Guildford Borough Economic Strategy 2013 – 2031 made no such case for siting large numbers of residential units within West Horsley. As previously stated, West Horsley is remote from the existing centres of employment and the new Economic Development Site proposals, which are focussed on the opposite side of the borough.

I just cannot understand why it is deemed necessary for such an excessive number of houses to be proposed to be built in West Horsley. To me it seems like total opportunism on behalf of GBC and local and owners which would be massively detrimental to the village of West Horsley.

I therefore OBJECT to the borough housing targets set out in Policy S2.

Furthermore, I am also concerned that all of the proposed Site Allocation sites are currently designated for years 1 – 5 of the plan, which I feel would only exacerbate local infrastructure problems.

CHARACTER OF THE LOCAL AREA

It is incredibly important that West Horsley’s local character, distinctiveness, history and architecture is clearly defined and then promoted and reinforced within the Proposed Local Plan. Poor or average design or execution within the village just cannot be accepted.

I therefore SUPPORT Policy D1: Making better places; where these sentiments are further reinforced by stating that “All developments will: …be laid out to make the best use of the natural features such as trees and hedges and levels, and enhance views into and out of the site....promote and reinforce local distinctiveness to create a sense of place....be expected to use art and materials of a nature appropriate to their setting”

Any new development should work to retain existing natural features and trees, rather than being allowed to clear all existing features to facilitate the standardised approach of volume house builders.

Also, and whilst I object to the principle of ‘insetting’ so many rural villages and West Horsley in particular, in general terms I can also SUPPORT Policy D4: Development in urban areas and inset villages.

Furthermore, I SUPPORT Policy H1: Homes for all, particularly the statements under the heading Housing Mix; that states “New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location..... and under the heading Density states that “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location.”

SITE ALLOCATION

At present there are four sites in West Horsley included as sites allocated for development within the Proposed Local Plan. Two further sites are being proposed for East Horsley, one of which immediately abuts the West Horsley parish boundary, which will no doubt primarily utilise the same local resources and infrastructure.

The four sites allocated within West Horsley are:

• Policy A37 – Land at and to the rear of Bell & Colvill, Epsom Road, WH (40 homes / 1.4 hectare / 28.6 dwellings per hectare)
• Policy A38 - Land to the west of West Horsley (Manor Farm, between East Lane and Long Reach) (135 homes / 8.4 hectare / 16.1 dwellings per hectare).

• Policy A40 - Land to the north of West Horsley (Waterloo Farm at rear of Ockham Road North) (120 homes / 8 hectare / 15 dwellings per hectare).

• Policy A41 - Land to the south of West Horsley (on East Lane) (90 homes / 4.8 hectare / 18.8 per hectare).

This is a total of 385 homes on 22.6 hectares, at an average density of 17 per hectare.

ADDED, Policy A39 - Land near Horsley Railway Station (off Ockham Road North and at rear of Heatherdene) (100 homes / 5.7 hectare / 17.5 per hectare) is immediately abutting the West Horsley Parish boundary, however it is not in West Horsley (as referred to incorrectly on page 125 of the Proposed Submission Local Plan) but is actually in East Horsley.

I would reiterate that I am not opposed to new housing in West Horsley per se; however this scale of potential development in, and around, West Horsley is excessive. I would strongly question the need for the inclusion of all four sites and certainly not at the densities proposed.

In particular I would like to STRONGLY OBJECT to the inclusion of Policy A41: Land to the south of West Horsley.

The Policy A41 site is, in my opinion, essential to the village’s semi-rural identity and character and it is vitally important that this open green aspect is maintained through what is, in so many ways, the centre of the village.

If the Proposed Local Plan is adopted, Policy A41 would allow this open space to become the only development (existing or proposed) of any significant depth along the whole of the southern side of the East lane / The Street corridor and would severely compromise this ‘green gap’ between the northern and southern parts of West Horsley.

This is contrary to at least two of the five essential purposes of Green Belt as defined at NPPF paragraph 80 (namely to check unrestricted sprawl and to assist in safeguarding the countryside from encroachment – functions which this part of the Green Belt, including this site, is recognised as performing at paragraph 8.2 of the Guildford Green Belt and Countryside Study).

This site had not previously been include as a potential development site within previous draft versions of the emerging Local Plan and assessment of this site, in background studies forming the evidence base for this Site Allocation, is based on incorrect information.

In particular:

1. In the Guildford Borough Land Availability Assessment (LAA) 2016 – Page 388 in respect of site reference 2063 (‘the site of East Lane’) it states under ‘summary of land designations’ – “Green Belt adjoining settlement boundary”. This is incorrect. Unlike any of the other three sites proposed in West Horsley, this site currently has no boundary that adjoins the village Settlement boundary as defined in the GBC Local Plan 2003.

1. Also, The Guildford Borough Green Belt and Countryside Study produced by Pegasus Planning Group, Volume III – Appendix VI – Sustainability Walking Distance Plans for Land Surrounding the Villages refers to the above site, plus the field beyond that the Council now propose removing from the Green Belt (together with a section of Lollesworth Wood) as site D. All assumed walking paths to (i) Nearest Local Centre, (ii) Healthcare Facility and (iii) Railway Station are presuming that access could have been gained to Lollesworth Lane via the undesignated (save that it has been proposed to be removed from the Green Belt) field to the south and fronting Lollesworth Lane. This field is currently used for grazing sheep and is owned by Mr & Mrs. Richard Wills of Lollesworth Farm who are my direct neighbours and they have HAVE MADE IT ABUNDANTLY CLEAR TO ME THAT UNDER NO CIRCUMSTANCES WHATSOEVER THEY WILL PERMIT SUCH ACCESS ROUTE ACROSS THEIR FIELD, therefore the assumption used by Pegasus Planning Group is incorrect and may well have a material effect on their conclusions.

Furthermore, any development on this site would not be consistent with the distinctive settlement pattern of the village and the important relationship between the built environment and the surrounding landscape (i.e. development on one side of
the route only). In my opinion, there will be considerable harm to important views of the village from surrounding landscape (from Lollesworth Lane) and from within the village of local landmarks (of Lollesworth Wood), contrary to Policy D4 of the Proposed Local Plan.

Allocation of the site will not “promote sustainable patterns of development” and the wildlife / environmental amenity loss of this site is likely to result in a significant detriment to the village’s character. Furthermore it will cause harm to the biodiversity and natural environment of the adjoining Lollesworth Wood SNCI. Indeed, this is contrary to Sustainability Objective 1 of the Sustainability Appraisal framework set out at Table 4.1 of the Guildford Borough Local Plan Sustainability Appraisal.

Indeed Policy I4: Green and blue infrastructure; states 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.” Local Sites are earlier defined in the policy as including Sites of Nature Conservation Importance (SNCI).

I cannot think of any reason for this amendment, save for a potential second phase development in the next Local Plan and surely it cannot be considered to be justified by “exceptional circumstances” when no alternative use is currently proposed and its current and historic use is as pasture?

Added to which, if the allocation of this site under Policy A41 is adopted, the prospect of further infilling and extension of the village settlement defined in the 2003 Local Plan on adjacent undeveloped, but currently protected, sites south of East Lane and north of Lollesworth Wood would significantly increase, raising the chances of further subsequent harm to the Green Belt and the purposes for which it has been designated in this area. Development of any nature in this location would result in the greater risk of encroachment and merging between the two built settlements in West Horsley and would fundamentally harm to the existing open and natural character of the village.

The proposed amendment to the Green Belt boundary in this location, resulting from the allocation of the site, does not therefore potentially have sufficient regard to its intended permanence in the long term or its capacity of enduring beyond the plan period. Indeed, in my opinion it is contrary to NPPF paragraph 83.

Added to which and contrary to the guidance of NPPF paragraph 85 it has not been clearly defined using “physical features that are readily recognisable and likely to be permanent”. In my opinion, the proposed revision to the Green Belt boundary in this location has been poorly considered.

I would therefore specifically OBJECT to the amendment of the Green Belt in this area, to both the site encompassed by Policy A41 and to the field and wood beyond Policy A41 site, whereby an adjacent field and part of the Lollesworth Wood (SNCI & Ancient Wood designated) to the south have been removed from the Green Belt.

Finally, if any of the above mentioned five sites (four in West Horsley and one in East Horsley) are ultimately to be included within the adopted Local Plan then very careful consideration should be given to the proposed density of any future developments. I think that it far more appropriate that a density of circa 8-10 homes per hectare and a maximum density of 15 homes per hectare is more appropriate for such semi-rural village locations, and certainly are more in keeping with the village’s existing character and density. The existing village settlement largely comprises low density housing, with a considerable mix of ages and housing styles. The number of houses proposed on each of the potential development sites in West Horsley, and thereby their densities, are completely out of character with the existing village, where a density of around 8-10 homes per hectare is much nearer to the norm.

West Horsley requires a balanced mix of homes to meet the community’s needs. West Horsley will require some smaller scale ‘affordable’ homes, both for young people starting home ownership or independent rental and for more elderly residents who wish to downsize for obvious reasons. I believe that a significant number of the ‘affordable’ housing should be available for shared ownership, enabling younger people and families to gain a foothold on the housing ladder, which they would otherwise be unable to due to the high cost of local housing. These younger residents would however contribute significantly to the fabric of the local community and would ensure a balanced community of all ages.

**TRANSPORT & HIGHWAY CONSIDERATIONS**
Any traffic generated from the proposed Site Allocation housing sites will further contribute to traffic congestion in the area. The existing road system is only appropriate for a semi-rural village, such as West Horsley; indeed its appearance and scale is one of the characteristics of the village.

Many of the traffic routes are little more than lanes, many with pavements on only one side of the carriageway. With many households now having at least two cars, the potential increase in traffic could overwhelm the existing infrastructure and lead to serious, and potentially life threatening, safety concerns.

No specific proposal as to how GBC intend to address these concerns has been detailed in the Local Plan or the Draft Guildford borough Infrastructure Delivery Plan 2016.

Furthermore, GBC are still championing the creation of a new significant settlement under Policy A35: Land at former Wisley Airfield, Ockham. This is potentially a double whammy for local infrastructure, and in particular local roads, from which it may never recover!

I would therefore **OBJECT to Policy A35: Land at former Wisley airfield, Ockham.**

Is at capacity. There is no adjacent land available for additional car parking provision. A significant increase in the village population will increase the pressure on station car parking and traffic movements to and from the station on already narrow and, at times, congested local roads.

There is currently a regular bus service operating along the A246 between Guildford and Leatherhead, however this is really only of use to residents at the southern end of West Horsley. There is also currently an extremely limited bus service along East Lane and The Street, through West Horsley village, which only operates 2 or 3 times per day between Monday to Friday only. There is no service at the weekends. Any significant development of new homes at this end of the village would necessitate an improvement in this service for it to be in any way considered sustainable.

In Policy I3: Sustainable transport for new developments; GBC proposes that "We will expect developments will contribute.... The policy as drafted is weak and non-specific and as such has no real specific directive that developers must contribute towards sustainable transport and is open to abuse from developers or housebuilders.

I would therefore ask that **Policy I3: Sustainable transport for new developments should be AMENDED** to state that GBC require this rather than expect them!

**INFRASTRUCTURE**

West Horsley is a small village with few local facilities. There is currently just one shop at the southern end of the village, where local car parking is very limited. Most people in West Horsley already have to travel, largely by car, to East Horsley for their day to day shopping, banking, doctors visits etc. The existing car parking facilities in East Horsley are already at capacity and any increase in the local population will add to the already existing problems. Any new development would not “support the continued viability” of the existing village infrastructure, as has been said by GBC in the past. In my opinion it would only serve to overload the same beyond breaking point.

State educational provision, both at junior (The Raleigh) and senior (The Howard of Effingham) school level, is already under strain and has been a real and sensitive issue for Surrey County Council and the local community for some years. The Raleigh School, which endeavours to serve both West Horsley and East Horsley, is full every year and has been so for decades. Its site is already fully developed and the opportunities for further expansion are limited. The Raleigh has however recently indicated to local residents that it cannot further increase capacity on its existing site and is considering its options for relocating, raising further concern about possible future erosion and harm to the Green Belt.

Secondary school places are already restricted in number at the Howard of Effingham School for children from West Horsley and all other available secondary schools are considerably further afield in either Guildford or Woking. Potential residential development in Effingham and Bookham would only further increase the problems for local West Horsley children, as children from these developments would, by being closer to the school, have priority. This, however, could push West Horsley children out of its potential catchment, with no currently sustainable local alternative.
I understand that a new junior school and senior school is proposed at the Wisley redevelopment site, although this will not be delivered until well into the plan period and certainly after the currently proposed residential development in West Horsley is well underway or finished.

In the Independent school sector, both Glenesk and Cranmore private schools are supported not just by local Horsley families, but also by many families from Guildford and other surrounding villages, some travelling significant distances. In term time each of these schools contributes to significant local traffic problems on Ockham Road North and the A246 respectively.

The Horsley Medical Centre is already at capacity, as it serves both East and West Horsley, and any additional development would necessitate an expansion of this facility. Possible extension is mentioned in the Draft Guildford borough Infrastructure Delivery Plan 2016 but scant detail, except for envisaged timescale, is given, which is completely unacceptable.

Finally, I also believe that the existing utilities infrastructure in the area would be further stretched, probably beyond acceptable limits.

Surface water drainage along East Lane has been a continual problem throughout the autumn and winter months. The addition of further built environment would just make these problems. I understand that Thames Water have already advised GBC that the area’s waste water network is unlikely to be able to support the demand anticipated from all the local developments.

I also understand that there may also be a serious under capacity of existing foul water sewers. The foul drainage system from West Horsley to the treatment works north of Ripley will, I understand, all need to be upgraded to cope with the increased demand. Thames Water has apparently advised that a two or three year lead-in period will be needed to install the necessary waste water network and treatment capacity after planning permission for any significant development is granted. Unfortunately I’m sure that housing developers will not be waiting that period before they want to build / sell their new houses! This is clearly unacceptable and again shows a flaw in the proposals put out for consultation by GBC.

Water pressure in the area is already poor.

I note that GBC states in Item 4.6.1 that “Timely provision of suitable, adequate infrastructure is crucial to the well-being of the borough’s population, and its economy. Guildford Borough Infrastructure baseline 2013 summarises the capacity and quality of existing infrastructure, including planned improvements. Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at, or near to, capacity or of poor quality.” I have no doubt that West Horsley must fit into this category.

I was pleased to note that Policy I1: Infrastructure and delivery; states its aim as being “To support delivery of this Local Plan, infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development...”. However it then goes on to say “where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.”

I don’t think that GBC can offer this “timely provision of necessary supporting infrastructure” – it either happens in full when developers commence construction or they are not granted planning permission.

WEST HORSLEYS HISTORY

West Horsley has many listed buildings, flint and Lovelace houses and any new developments need to be built in keeping with the existing architecture and not just bland developments from the volume house builders.

CONCLUSION
I fully appreciate that more houses need to be built both for the young and the old but it needs to be measured, proportionate and not excessive (ie not increase the population of West Horsley by 60%) and the Green Belt which is a real asset to West Horsley, the borough, the county and the whole of the UK NEEDS TO BE PROTECTED AS FAR AS IS POSSIBLE. And thus all new housing should be built to a measured quantity (eg 120 houses in total in West Horsley with circa 25 houses on each site) and before any Green Belt avenue is explored existing brownfield sites close to areas of employment must and have to be utilised. I do not believe that the Proposed Submission Local Plan : Strategy and Sites 2016 has completely reviewed the possibilities for residential development on such land. The proven need (OAN) for the full extent of new housing proposed I completely disagree with. The proposed potential development in West Horsley is excessive and inappropriate and over dense and certain locations should be removed.

The inclusion of the proposed allocation to the south of West Horsley under Policy A41 is unsound in that, having regard to the advide at paragraph 182 of the NPPF. Allocation of this specific site and its Policy is neither consistent with national policy, nor is it justified. This proposed allocation site (Policy A41) should be removed from the Local Plan and it should be returned to the protection that its present Green Belt designation gives it. The case for “exceptional circumstances” has not been proven for the proposed change in Green Belt boundary here, and actually the same goes for many other locations in the borough.

- Also the proposed removal of the field and part of Lollesworth Wood to the south of the above site is completely wrong and should be reconsidered and returned to the protection that its present Green Belt designation gives it. Added to which the field is owned by Mr and Mrs Richard Wills and they absolutely will not give access rights for a footpath through their land.
- I do not accept the case for “exceptional circumstances” has been proven for the proposed change in Green Belt boundary here either.
- High density development in West Horsley is completely inappropriate and a more appropriate level of density (as highlighted earlier) would be right for the village with small houses as well as apartments for the young and old alike. To finish any significant new housing in West Horsley would need huge improvements in the existing infrastructure (education, doctors, drainage, parking, improvements of the road network).

It seems to me over the next 3-5 years West Horsley is line for a disproportionate no of new houses. If West Horsley sites Policy A37,38,40 and 41 and Policy A39 which immediately abuts the West Horsley Parish boundary are all built out that is just under 500 new houses, where the tarhet is 693 homes per year in the borough for 20 yrs – that is just under 15% of the boroughs quota per year which is clearly grossly excessive for West Horsley to be dealt this blow.

Why are 70% of new homes being proposed to be built on Green Belt or on other countryside. 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 scale of new building throughout the borough, which is disproportionate and unjustified, particularly in West Horsley. I think the calculation of housing need is unsubstantiated. The model has not been scrutinised and 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. This means Green Belt land is used for housing development unnecessarily.

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.

OVERALL I OBJECT TO THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN : STRATEGY AND SITES 2016 as large parts are excessive, unsound and technically incorrect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD BOROUGH – PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2016 CONSULTATION

I write regarding the above and ask that the following comments be taken into account when considering the same.

I live in the village of West Horsley and therefore many of my comments relate to the specific issues relating to that village alone.

The Issue

I am aware of Central Government’s desire to increase the UK’s housing provision, particularly in the South East, and within this context Guildford Borough Council (GBC) is under pressure to adopt a deliverable Local Plan for the borough for the period until 2031 and with particular reference to housing provision.

Within this context, I believe that the extra housing provision in discussion should ideally be located on existing brownfield sites within the borough and be located as near as possible to the centres of employment. I do not believe that the current document has given sufficient consideration to the this issue, seeking instead an over-reliance on the proposed utilisation of the currently designated Green Belt land around local villages, particularly to the east of the borough, to meet such needs.

In my opinion (and this is formulated through extensive research and professional advice taken) this is a fundamental flaw in the Guildford borough Submission Local Plan 2016 (Proposed Local Plan) as it proposes extensive residential development that will be remote from the existing centres of employment or where indicated within the Proposed Local Plan; these being largely on the opposite side of the borough. Such a policy would be counter to the principles of sustainable development and would undoubtedly put further pressure on the already struggling transport infrastructure. I would like to see this approach rejected and the bulk of new proposed housing allocated nearer to the existing and proposed centres of employment, i.e. within and around Guildford town centre / urban area, rather than in the borough’s outlying, and previously protected, villages.

But I also think that semi-rural villages in the borough, such as West Horsley should and be expected to bear some of the brunt of the future housing provision as it is necessary to increase the number of houses within the village, amongst other reasons, for the young to be able to stay within the village and the older residents to have the opportunity to downsize within the village, but any such housing provision must only be allocated having considered many factors, such as: environmental issues (inc Green Belt), housing needs, local character and architecture, transport and highway situations, infrastructure (schooling, doctors, car parking in and around the village and at the rail stn, potential development sites amongst others.

I will therefore set out my views on each topic with regard to West Horsley below.

National Planning Policy Framework (NPPF), paragraph 182, advises that a Local Plan can only be adopted if it is sound.

As a matter of government policy, soundness requires a plan to be:

- positively prepared;
- justified;
- effective;
- consistent with national policy.
Within these four heads it should enable, over its plan period, the delivery of sustainable development in accordance with the NPPF.

I have several strong concerns as to whether this is the case within the Proposed Local Plan, as currently drafted, and believe that some of the current policies are not justified nor consistent with national policy, thereby rendering the same unsound without significant revision.

I therefore OBJECT to the Guildford borough Proposed Submission Local Plan – Strategy & Sites 2016 as currently drafted.

ENVIRONMENTAL ISSUES (INC. GREEN BELT)

In my opinion, the Metropolitan Green Belt and its special natural environment is a defining characteristic of Guildford borough and, indeed, West Horsley.

I believe that there should remain a general presumption that it should be protected. The Green Belt should only be sacrificed as a last resort, as once lost it can never be reclaimed. Many many villages in Guildford borough are still threatened with removal from their long established Green Belt designation, including where I live, the village of West Horsley. Personally, I do not believe that West Horsley’s currently defined Settlement Area boundaries (ref. 2003 Local Plan) needs such a significant extension, as is being proposed, and perhaps only needs a smaller scale review. In this context, paragraph of Policy P2: Green Belt; is in my opinion so badly worded. For GBC to state “We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development” is not being represented at all in the way they are proposing removing so much of the Green Belt, and I do not agree with the proposals map and its proposed new Green Belt boundary.

The national policy regarding protection for the Green Belt is contained within section 9 of the NPPF. Paragraph 79 confirms that the Government attaches great importance to Green Belts. Paragraph 84 of the NPPF advises that “When drawing up or reviewing Green Belt boundaries 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”.

GBC states in item 4.3.12 that “national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt”.

I believe that West Horsley’s open, semi-rural character makes an important contribution to the openness of the Green Belt in this part of the borough. This is the specific and differentiating characteristic of West Horsley over its more ‘leafy’ and more tightly developed neighbour, East Horsley, which I believe GBC and its consultants have failed to recognise or protect.

It is a strong feeling that the semi-rural landscape character of the village is greatly valued by West Horsley residents and is detailed in general terms within the Guildford Borough Council Landscape Character Assessment.

A huge amount of the character of West Horsley is defined by the open views, (via paths, gates, farm entrance openings, bridle ways etc) from the roads either entering or passing through the village settlement.

Throughout the village, stretches of undeveloped countryside on just one side of Ockham Road North, then East Lane, Ripley Lane and Long Reasch, and also The Street boldly reinforce this characteristic. The clearly defined precedent is of
the village settlement being on one side of the route and there being open vistas across fields and meadows and paddocks or into woodlands on the other. This should be protected not compromised by any developments.

Also the fact that the main traffic route through the village (along East Lane and The Street) currently benefits from a ‘green gap’ of woods and fields to the north (between The Rectory, roughly opposite Northcote Road to Grovelands Farm, beyond the railway bridge) and to the south (between Roundtree Farm and the listed Railway Cottages, at the Railway bridge). This natural green area, centred on the Lellesworth Lane and Long Reach junction, is in many ways the real centre of the village.

Clearly Green Belt everywhere is under pressure, but in my opinion, I strongly feel that any linear extensions of the existing settlement boundaries should be strongly resisted.

I therefore believe that the parish of West Horsley’s open, semi-rural, character does indeed make clear and important contribution to the openness of the Green Belt, and therefore I believe that, under national planning policy it should remain “washed over by” the Green Belt, rather than being “inset from the Green Belt” as proposed.

Policy on development with the Metropolitan Green Belt is set out in paragraphs 79 – 92 of the NPPF.

Inappropriate development is, by definition, harmful to Green Belt and paragraph 87 of the NPPF clearly states that it “should not be approved except in very special circumstances”. Furthermore paragraph 89 advises local planning authorities to “regard the construction of new buildings as inappropriate in Green Belt”.

Whilst I accept that it is possible for a local planning authority to conduct a review of Green Belt land and consider redefining boundaries which add or take away Green Belt land in order to meet these “very special circumstances”, paragraph 83 of the NPPF states, “Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

This paragraph clearly sets out that a Green Belt review should only happen in “exceptional circumstances”. This idea is further explained on in paragraph 82 as being “for example when planning for larger scale development such as new settlements or major urban extensions”. The proposals for West Horsley are neither a NEW SETTLEMENT NOR A MAJOR URBAN EXTENSION.

I note that within item 4.3.16 GBC states that “We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed to promote sustainable patterns of development.” - in my opinion these are absolutely not EXCEPTIONAL CIRCUMSTANCES and therefore I am requesting that this sentence is removed.

I cannot see how GBC have directed sustainable development towards existing urban areas and also have not directed it next towards town and villages already inset with the Green Belt.

Removal of any land from the Green Belt should only be allowed after long and thoughtful consideration of the individual sites concerned. I fear that the proposed ‘wholesale’ removal from being “washed over by the Green Belt” to being “inset within the Green Belt” will forever change the nature of West Horsley and, once lost, the character of our village and many surrounding villages will be changed for the worse forever and will clearly be irreversible, which would be a tragic and very sad loss to West Horsley.

I am therefore OBJECTING to the proposals map and the proposed amendment of the Green Belt boundary around West Horsley in particular. I would ask that the proposals map be rejected, reconsidered and amended.

HOUSING NEED
The target house building programme proposed by GBC represents a 25% increase in the housing stock of the borough, whilst we have been advised that the Office of National Statistics (ONS) projects a population increase of some 15% for the borough of Guildford over the same period, I THEREFORE CANNOT SEE OR UNDERSTAND WHY GBC DEEMS IT SO NECESSARY TO INCREASE THE TARGET HOUSE BUILDING PROGRAMME BY A 25% INCREASE IN THE HOUSING STOCK OF THE BOROUGH.

Without a doubt the proposed increase in the number of new houses required has NOT been proven for the village of West Horsley. In my opinion the Proposed Submission Local Plan in respect of West Horsley is excessive in terms of the potential residential provision currently indicated.

I do not believe that the scale of development proposed, in any way, reflects the actual need, or that it respects the local character and existing built density of the village. But I do strongly feel the Horsleys (both East and West) should have new houses built for reasons already stated (PARTICULARLY FOR THE YOUNG AND OLD) but in a much less excessive way. The necessity for 385 new houses on the four proposed sites is grossly excessive.

The population of West Horsley is circa 2828 – to build 385 houses with an increasing family size per household according to new data from Eurostat (according to a Telegraph article of August 2015) stating that the average of 2.4 children is now growing and there are more four baby families now in Britain than almost all of Europe. If we assume that it is still only 2.4 children per family then 385 houses will equate to circa 1700 people – that is a 60% increase on the already existing population of West Horsley – I cannot comprehend the thought process of GBC if they actually want to increase the population of West Horsley by 60% - the village will quite literally just not be able to cope in anyway whatsoever. If the population was increased by 15-20% then it would be necessary to build circa 130 more houses or circa 33 per the four proposed sites, which would be so much more appropriate and within the desires of circa 95% of the Horsleys (East and West).

I therefore OBJECT to the current site allocation and housing densities proposed for all four sites in West Horsley.

I understand that in March 2014 the Government published a new web-based Planning Practise Guidance (Housing & economic land availability assessment, Methodology – stage 5: Final evidence base, 6 March 2014) to accompany and give further detail about the policies in the NPPF. This guidance set out that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify development within the Green Belt. It states “Unmet housing need 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”.

On 4th October 2014, I understand that the Government announced that it had updated its online Planning Practise Guidance. The aim of this was to reaffirm local authorities’ abilities to “safeguard their local area against urban sprawl, and to protect the green lungs around towns and cities”. The Government said that it wanted to make planning policy clear that housing need does not justify the harm done to the Green Belt by inappropriate development.

The new guidance read: “Do housing and economic needs override constraints on the use of land, such as Green Belt? - The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. 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 Green Belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

The Framework makes clear that, once established, Green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
Do local planning authorities have to meet in full housing needs identified in needs assessments? – Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.

On the 19 December 2014 the Planning Minister wrote to the Chief Executive at the Planning Inspectorate about Strategic Housing Market Assessments. This letter set out the relationship between housing figures produced as part of a Strategic Housing Market Assessment and those in a Local Plan and how to take into account constraints such as Green Belt land:

“However, the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans.

It does not immediately or in itself invalidate housing numbers in existing Local Plans. Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement. They also need to consider whether there are opportunities to co-operate with neighbouring planning authorities to meet needs across housing market areas. Only after those considerations are complete will the council’s approach be tested at examination by an inspector. Clearly each council will need to work through this process to take account of particular local circumstances in responding to Strategic Housing Market Assessments”.

It is strongly of my opinion that the overall extent of development required in the borough necessary to meet the employment and housing needs in the borough, as set out in Policy S2, has not been satisfactorily defined having regard to the methodology summarised above.

The West Surrey Strategic Housing Market assessment (SHMA) assesses an Objectively Assessed Need (OAN) of 633 dwellings per annum “but does not take into account land supply or other constraints to development”, as per paragraph 1.2 of the Guildford Summary Report – October 2015. This figure is acknowledged as including upwards adjustments to support growth in student numbers and higher migration levels than are shown in the 2012-based Population Projections and represents an OAN 23% higher than need calculated through London sensitivity analysis, as per paragraphs 4.1 – 4.2 of the same Guildford summary Report.

Policy S2 of the Proposed Local Plan applies uncritically this OAN figure to identify a housing requirement of 13,860 dwellings for the plan period (20 years at 693 dwellings per annum). There is no evidence to indicate that in defining this figure GBC has undertaken a careful consideration of “whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement” and which indicate that development should be restricted.

In my opinion, the Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is simply NOT ADEQUATELY JUSTIFIED OR SUPPORTED WITH SOUND ARGUMENT OR TAKING INTO ACCOUNT GOVERNMENT POLICY REGARDING THE PROTECTION OF GREENBELT AND EXCEPTIONAL CIRCUMSTANCES.

Furthermore, I also understand that GBC will not release details of the methodology used by their third party consultants to arrive at the OAN figures used, which, in my opinion, also makes the likelihood of the Proposed Local Plan being considered unsound in this respect. Given that these OAN figures then play such a fundamental role in many of the Site and Strategy issues (and in particular Site Allocation) I believe that much of the Proposed Local Plan is very much open to challenge, possibly including judicial review.
A disproportionate burden of meeting what GBC has chosen to define as its development needs is also proposed to fall on the more rural east of the borough.

Within this eastern area, West Horsley is then allocated to bear an excessive proportion of this proposed development (as stated above, circa 60% increase of the population of West Horsley), despite the numerous countervailing reasons and objections put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to both senior and junior school places; medical facilities, parking availability at the station, etc.) If adopted, the draft plan will put an unsustainable pressure on all local resources and infrastructure.

I would further make the point that the Guildford Borough Economic Strategy 2013 – 2031 made no such case for siting large numbers of residential units within West Horsley. As previously stated, West Horsley is remote from the existing centres of employment and the new Economic Development Site proposals, which are focussed on the opposite side of the borough.

I just cannot understand why it is deemed necessary for such an excessive number of houses to be proposed to be built in West Horsley. To me it seems like total opportunism on behalf of GBC and local and owners which would be massively detrimental to the village of West Horsley.

I therefore OBJECT to the borough housing targets set out in Policy S2.

Furthermore, I am also concerned that all of the proposed Site Allocation sites are currently designated for years 1 – 5 of the plan, which I feel would only exacerbate local infrastructure problems.

**CHARACTER OF THE LOCAL AREA**

It is incredibly important that West Horsley’s local character, distinctiveness, history and architecture is clearly defined and then promoted and reinforced within the Proposed Local Plan. Poor or average design or execution within the village just cannot be accepted.

I therefore SUPPORT Policy D1: Making better places; where these sentiments are further reinforced by stating that “All developments will: …be laid out to make the best use of the natural features such as trees and hedges and levels, and enhance views into and out of the site….promote and reinforce local distinctiveness to create a sense of place….be expected to use art and materials of a nature appropriate to their setting”

Any new development should work to retain existing natural features and trees, rather than being allowed to clear all existing features to facilitate the standardised approach of volume house builders.

Also, and whilst I object to the principle of ‘insetting’ so many rural villages and West Horsley in particular, in general terms I can also SUPPORT Policy D4: Development in urban areas and inset villages.

Furthermore, I SUPPORT Policy H1: Homes for all, particularly the statements under the heading Housing Mix; that states “New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location….. and under the heading Density states that “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location.”

**SITE ALLOCATION**

At present there are four sites in West Horsley included as sites allocated for development within the Proposed Local Plan. Two further sites are being proposed for East Horsley, one of which immediately abuts the West Horsley parish boundary, which will no doubt primarily utilise the same local resources and infrastructure.

The four sites allocated within West Horsley are:
• Policy A37 – Land at and to the rear of Bell & Colvill, Epsom Road, WH (40 homes / 1.4 hectare / 28.6 dwellings per hectare)

• Policy A38 - Land to the west of West Horsley (Manor Farm, between East Lane and Long Reach) (135 homes / 8.4 hectare / 16.1 dwellings per hectare).

• Policy A40 - Land to the north of West Horsley (Waterloo Farm at rear of Ockham Road North) (120 homes / 8 hectare / 15 dwellings per hectare).

• Policy A41 - Land to the south of West Horsley (on East Lane) (90 homes / 4.8 hectare / 18.8 per hectare).

This is a total of 385 homes on 22.6 hectares, at an average density of 17 per hectare.

ADDED, Policy A39 - Land near Horsley Railway Station (off Ockham Road North and at rear of Heatherdene) (100 homes / 5.7 hectare / 17.5 per hectare) is immediately abutting the West Horsley Parish boundary, however it is not in West Horsley (as referred to incorrectly on page 125 of the Proposed Submission Local Plan) but is actually in East Horsley.

I would reiterate that I am not opposed to new housing in West Horsley per se; however this scale of potential development in, and around, West Horsley is excessive. I would strongly question the need for the inclusion of all four sites and certainly not at the densities proposed.

In particular I would like to STRONGLY OBJECT to the inclusion of Policy A41: Land to the south of West Horsley.

The Policy A41 site is, in my opinion, essential to the village’s semi-rural identity and character and it is vitally important that this open green aspect is maintained through what is, in so many ways, the centre of the village.

If the Proposed Local Plan is adopted, Policy A41 would allow this open space to become the only development (existing or proposed) of any significant depth along the whole of the southern side of the East lane / The Street corridor and would severely compromise this ‘green gap’ between the northern and southern parts of West Horsley.

This is contrary to at least two of the five essential purposes of Green Belt as defined at NPPF paragraph 80 (namely to check unrestricted sprawl and to assist in safeguarding the countryside from encroachment – functions which this part of the Green Belt, including this site, is recognised as performing at paragraph 8.2 of the Guildford Green Belt and Countryside Study).

This site had not previously been include as a potential development site within previous draft versions of the emerging Local Plan and assessment of this site, in background studies forming the evidence base for this Site Allocation, is based on incorrect information.

In particular:

1. In the Guildford Borough Land Availability Assessment (LAA) 2016 – Page 388 in respect of site reference 2063 (‘the site of East Lane’) it states under ‘summary of land designations’ – “Green Belt adjoining settlement boundary”. **This is incorrect.** Unlike any of the other three sites proposed in West Horsley, this site currently has no boundary that adjoins the village Settlement boundary as defined in the GBC Local Plan 2003.

1. Also, The Guildford Borough Green Belt and Countryside Study produced by Pegasus Planning Group, Volume III – Appendix VI – Sustainability Walking Distance Plans for Land Surrounding the Villages refers to the above site, plus the field beyond that the Council now propose removing from the Green Belt (together with a section of Lollesworth Wood) as site D. All assumed walking paths to (i) Nearest Local Centre, (ii) Healthcare Facility and (iii) Railway Station are presuming that access could have been gained to Lollesworth Lane via the undesignated (save that it has been proposed to be removed from the Green Belt) field to the south and fronting Lollesworth Lane. This field is currently used for grazing sheep and is owned by Mr & Mrs. Richard Wills of Lollesworth Farm who are my direct neighbours and they have **HAVE MADE IT ABUNDANTLY CLEAR TO ME THAT UNDER NO CIRCUMSTANCES WHATSOEVER THEY WILL PERMIT SUCH ACCESS ROUTE ACROSS THEIR FIELD, therefore the assumption used by Pegasus Planning Group is incorrect** and may well have a material effect on their conclusions.
Furthermore, any development on this site would not be consistent with the distinctive settlement pattern of the village and the important relationship between the built environment and the surrounding landscape (i.e. development on one side of the route only). In my opinion, there will be considerable harm to important views of the village from surrounding landscape (from Lollesworth Lane) and from within the village of local landmarks (of Lollesworth Wood), contrary to Policy D4 of the Proposed Local Plan.

Allocation of the site will not “promote sustainable patterns of development” and the wildlife / environmental amenity loss of this site is likely to result in a significant detriment to the village’s character. Furthermore it will cause harm to the biodiversity and natural environment of the adjoining Lollesworth Wood SNCL. Indeed, this is contrary to Sustainability Objective 1 of the Sustainability Appraisal framework set out at Table 4.1 of the Guildford Borough Local Plan Sustainability Appraisal.

Indeed Policy I4: Green and blue infrastructure; states 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.” Local Sites are earlier defined in the policy as including Sites of Nature Conservation Importance (SNCL).

I cannot think of any reason for this amendment, save for a potential second phase development in the next Local Plan and surely it cannot be considered to be justified by “exceptional circumstances” when no alternative use is currently proposed and its current and historic use is as pasture?

Added to which, if the allocation of this site under Policy A41 is adopted, the prospect of further infilling and extension of the village settlement defined in the 2003 Local Plan on adjacent undeveloped, but currently protected, sites south of East Lane and north of Lollesworth Wood would significantly increase, raising the chances of further subsequent harm to the Green Belt and the purposes for which it has been designated in this area. Development of any nature in this location would result in the greater risk of encroachment and merging between the two built settlements in West Horsley and would fundamentally harm to the existing open and natural character of the village.

The proposed amendment to the Green Belt boundary in this location, resulting from the allocation of the site, does not therefore potentially have sufficient regard to its intended permanence in the long term or its capacity of enduring beyond the plan period. Indeed, in my opinion it **is contrary to NPPF paragraph 83.**

Added to which and **contra**ry to the guidance of NPPF paragraph 85 it has not been clearly defined using “physical features that are readily recognisable and likely to be permanent”. In my opinion, the proposed revision to the Green Belt boundary in this location has been poorly considered.

I would therefore specifically **OBJECT** to the amendment of the Green Belt in this area, to both the site encompassed by Policy A41 and to the field and wood beyond Policy A41 site, whereby an adjacent field and part of the Lollesworth Wood (SNCL & Ancient Wood designated) to the south have been removed from the Green Belt.

Finally, if any of the above mentioned five sites (four in West Horsley and one in East Horsley) are ultimately to be included within the adopted Local Plan then very careful consideration should be given to the proposed density of any future developments. I think that it far more appropriate that a density of circa 8-10 homes per hectare and a maximum density of 15 homes per hectare is more appropriate for such semi-rural village locations, and certainly are more in keeping with the village’s existing character and density. The existing village settlement largely comprises low density housing, with a considerable mix of ages and housing styles. The number of houses proposed on each of the potential development sites in West Horsley, and thereby their densities, are completely out of character with the existing village, where a density of around 8-10 homes per hectare is much nearer to the norm.

West Horsley requires a balanced mix of homes to meet the community’s needs. West Horsley will require some smaller scale ‘affordable’ homes, both for young people starting home ownership or independent rental and for more elderly residents who wish to downsize for obvious reasons. I believe that a significant number of the ‘affordable’ housing should be available for shared ownership, enabling younger people and families to gain a foothold on the housing ladder, which they would otherwise be unable to due to the high cost of local housing. These younger residents would however contribute significantly to the fabric of the local community and would ensure a balanced community of all ages.
TRANSPORT & HIGHWAY CONSIDERATIONS

Any traffic generated from the proposed Site Allocation housing sites will further contribute to traffic congestion in the area. The existing road system is only appropriate for a semi-rural village, such as West Horsley; indeed its appearance and scale is one of the characteristics of the village.

Many of the traffic routes are little more than lanes, many with pavements on only one side of the carriageway. With many households now having at least two cars, the potential increase in traffic could overwhelm the existing infrastructure and lead to serious, and potentially life threatening, safety concerns.

No specific proposal as to how GBC intend to address these concerns has been detailed in the Local Plan or the Draft Guildford borough Infrastructure Delivery Plan 2016.

Furthermore, GBC are still championing the creation of a new significant settlement under Policy A35: Land at former Wisley Airfield, Ockham. This is potentially a double whammy for local infrastructure, and in particular local roads, from which it may never recover!

I would therefore OBJECT to Policy A35: Land at former Wisley airfield, Ockham.

Is at capacity. There is no adjacent land available for additional car parking provision. A significant increase in the village population will increase the pressure on station car parking and traffic movements to and from the station on already narrow and, at times, congested local roads.

There is currently a regular bus service operating along the A246 between Guildford and Leatherhead, however this is really only of use to residents at the southern end of West Horsley. There is also currently an extremely limited bus service along East Lane and The Street, through West Horsley village, which only operates 2 or 3 times per day between Monday to Friday only. There is no service at the weekends. Any significant development of new homes at this end of the village would necessitate an improvement in this service for it to be in any way considered sustainable.

In Policy I3: Sustainable transport for new developments; GBC proposes that “We will expect developments will contribute...”. The policy as drafted is weak and non-specific and as such has no real specific directive that developers must contribute towards sustainable transport and is open to abuse from developers or housebuilders.

I would therefore ask that Policy I3: Sustainable transport for new developments should be AMENDED to state that GBC require this rather than expect them!

INFRASTRUCTURE

West Horsley is a small village with few local facilities. There is currently just one shop at the southern end of the village, where local car parking is very limited. Most people in West Horsley already have to travel, largely by car, to East Horsley for their day to day shopping, banking, doctors visits etc. The existing car parking facilities in East Horsley are already at capacity and any increase in the local population will add to the already existing problems. Any new development would not “support the continued viability” of the existing village infrastructure, as has been said by GBC in the past. In my opinion it would only serve to overload the same beyond breaking point.

State educational provision, both at junior (The Raleigh) and senior (The Howard of Effingham) school level, is already under strain and has been a real and sensitive issue for Surrey County Council and the local community for some years. The Raleigh School, which endeavours to serve both West Horsley and East Horsley, is full every year and has been so for decades. Its site is already fully developed and the opportunities for further expansion are limited. The Raleigh has however recently indicated to local residents that it cannot further increase capacity on its existing site and is considering its options for relocating, raising further concern about possible future erosion and harm to the Green Belt.

Secondary school places are already restricted in number at the Howard of Effingham School for children from West Horsley and all other available secondary schools are considerably further afield in either Guildford or Woking. Potential residential development in Effingham and Bookham would only further increase the problems for local West Horsley children, as children from these developments would, by being closer to the school, have priority. This, however, could push West Horsley children out of its potential catchment, with no currently sustainable local alternative.
I understand that a new junior school and senior school is proposed at the Wisley redevelopment site, although this will not be delivered until well into the plan period and certainly after the currently proposed residential development in West Horsley is well underway or finished.

In the Independent school sector, both Glenesk and Cranmore private schools are supported not just by local Horsley families, but also by many families from Guildford and other surrounding villages, some travelling significant distances. In term time each of these schools contributes to significant local traffic problems on Ockham Road North and the A246 respectively.

The Horsley Medical Centre is already at capacity, as it serves both East and West Horsley, and any additional development would necessitate an expansion of this facility. Possible extension is mentioned in the Draft Guildford borough Infrastructure Delivery Plan 2016 but scant detail, except for envisaged timescale, is given, which is completely unacceptable.

Finally, I also believe that the existing utilities infrastructure in the area would be further stretched, probably beyond acceptable limits.

Surface water drainage along East Lane has been a continual problem throughout the autumn and winter months. The addition of further built environment would just make these problems worse. I understand that Thames Water have already advised GBC that the area’s waste water network is unlikely to be able to support the demand anticipated from all the local developments.

I also understand that there may also be a serious under capacity of existing foul water sewers. The foul drainage system from West Horsley to the treatment works north of Ripley will, I understand, all need to be upgraded to cope with the increased demand. Thames Water has apparently advised that a two or three year lead-in period will be needed to install the necessary waste water network and treatment capacity after planning permission for any significant development is granted. Unfortunately I’m sure that housing developers will not be waiting that period before they want to build / sell their new houses! This is clearly unacceptable and again shows a flaw in the proposals put out for consultation by GBC.

Water pressure in the area is already poor.

I note that GBC states in Item 4.6.1 that “Timely provision of suitable, adequate infrastructure is crucial to the well-being of the borough’s population, and its economy. Guildford Borough Infrastructure baseline 2013 summarises the capacity and quality of existing infrastructure, including planned improvements. Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at, or near to, capacity or of poor quality.” I have no doubt that West Horsley must fit into this category.

I was pleased to note that Policy I1: Infrastructure and delivery; states its aim as being “To support delivery of this Local Plan, infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development...”. However it then goes on to say “where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.”

I don’t think that GBC can offer this “timely provision of necessary supporting infrastructure” – it either happens in full when developers commence construction or they are not granted planning permission.

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WEST HORSLEYS HISTORY

West Horsley has many listed buildings, flint and Lovelace houses and any new developments need to be built in keeping with the existing architecture and not just bland developments from the volume house builders.

CONCLUSION

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I fully appreciate that more houses need to be built both for the young and the old but it needs to be measured, proportionate and not excessive (ie not increase the population of West Horsley by 60%) and the Green Belt which is a real asset to West Horsley, the borough, the county and the whole of the UK NEEDS TO BE PROTECTED AS FAR AS IS POSSIBLE. And thus all new housing should be built to a measured quantity (eg 120 houses in total in West Horsley with circa 25 houses on each site) and before any Green Belt avenue is explored existing brownfield sites close to areas of employment must and have to be utilised. I do not believe that the Proposed Submission Local Plan : Strategy and Sites 2016 has completely reviewed the possibilities for residential development on such land. The proven need (OAN) for the full extent of new housing proposed I completely disagree with. The proposed potential development in West Horsley is excessive and inappropriate and over dense and certain locations should be removed.

The inclusion of the proposed allocation to the south of West Horsley under Policy A41 is unsound in that, having regard to the advise at paragraph 182 of the NPPF. Allocation of this specific site and its Policy is neither consistent with national policy, nor is it justified. This proposed allocation site (Policy A41) should be removed from the Local Plan and it should be returned to the protection that its present Green Belt designation gives it. The case for “exceptional circumstances” has not been proven for the proposed change in Green Belt boundary here, and actually the same goes for many other locations in the borough.

- Also the proposed removal of the field and part of Lollesworth Wood to the south of the above site is completely wrong and should be reconsidered and returned to the protection that its present Green Belt designation gives it. Added to which the field is owned by Mr and Mrs Richard Wills and they absolutely will not give access rights for a footpath through their land.
- I do not accept the case for “exceptional circumstances” has been proven for the proposed change in Green Belt boundary here either.
- High density development in West Horsley is completely inappropriate and a more appropriate level of density (as highlighted earlier) would be right for the village with small houses aswell as apartments for the young and old alike. To finish any significant new housing in West Horsley would need huge improvements in the existing infrastructure (education, doctors, drainage, parking, improvements of the road network).

It seems to me over the next 3-5 years West Horsley is line for a disproportionate no of new houses. If West Horsley sites Policy A37,38,40 and 41 and Policy A39 which immediately abuts the West Horsley Parish boundary are all built out that is just under 500 new houses, where the tarhet is 693 homes per year in the borough for 20 yrs – that is just under 15% of the boroughs quota per year which is clearly grossly excessive for West Horsley to be dealt this blow.

Why are 70% of new homes being proposed to be built on Green Belt or on other countryside. 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 scale of new building throughout the borough, which is disproportionate and unjustified, particularly in West Horsley. I think the calculation of housing need is unsubstantiated. The model has not been scrutinised and 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. This means Green Belt land is used for housing development unnecessarily.

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.

OVERALL I OBJECT TO THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN : STRATEGY AND SITES 2016 as large parts are excessive, unsound and technically incorrect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Further to your letter, dated 7th June 2017, inviting me to take part in the targeted consultation on Guildford Borough Council’s Proposed Submission Local Plan: strategy and sites (2017), I am writing to you as I fully support the proposed change to the Proposed Submission Local Plan relating to the deletion of the previously proposed Policy A41.

It is pleasing to see that the site which had been previously indicated for housing under policy A41 has now been removed from the allocation sites for housing and now remains within the protection of the Green Belt designation. It is a greatly appreciated decision that means that this natural and beautiful area of West Horsley has been returned to the protection of the Green Belt area and will remain as such to the enhancement of the ruralness and open spaces which make Horsley the beautiful place that it is.

Thank you for this proposed change and I personally give you my full support re your decision.

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): ()

In particular I have issues with Guildford’s plans for the following developments as they do not show consideration for their surroundings, the impact the influx of large numbers of people will have on village life or the roads that will receive increased traffic flow.

I OBJECT TO development of Clockburn Nursery, Tannery Lane (45 houses) covers an area where there is already a marina and 64 apartments planned. Tannery lane is a single track road that already takes far too much traffic. The quality of the road is poor and the edges non-existent and walking along these roads impossible. It emerges at Send Road at a cross roads that is already horrendous to navigate.

I OBJECT TO development of Garlick’s Arch, opposite Send Marsh Road, (400 houses and 7,000 sq. Metres of industrial space) slipped in at the last moment in the hope it would be overlooked. This particular site reeks of underhandedness and it would be interesting to know who has a vested interest in this going ahead. Such a large number of houses and industrial buildings on virgin green fields is criminal in the extreme. Guildford has plenty of existing industrial complexes that would welcome expansion and which already have the infrastructure in place to take the traffic generated. Such a large number of houses and influx of people will totally change the character of the area. Where are the extra schools and doctors to support these numbers? We are struggling now to get appointments with our doctors and our children into our schools of choice right now, increase the population by 25% and it will be impossible.

I OBJECT TO New interchange on A3 at Burnt Common. It is obvious that this is being put in place to support the huge housing sites intended for Wisley Airfield, Garlick’s Arch and Gosden Farm. Building these sites will be easier to pass if Guildford can show they have this road infrastructure in place. It will destroy an area of countryside that supports a high diversity of wildlife and destroy the peace and quiet for current householders in the area. It will also cause more congestion on the A3 which struggles at peak times already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6410  Respondent: 15590529 / Linda Mumford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6411  Respondent: 15590529 / Linda Mumford  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, opposite Send Marsh Road, (400 houses and 7,000 sq. Metres of industrial space) slipped in at the last moment in the hope it would be overlooked. This particular site reeks of underhandedness and it would be interesting to know who has a vested interest in this going ahead. Such a large number of houses and industrial buildings on virgin green fields is criminal in the extreme. Guildford has plenty of existing industrial complexes that would welcome expansion and which already have the infrastructure in place to take the traffic generated. Such a large number of houses and influx of people will totally change the character of the area. Where are the extra schools and doctors to support these numbers? We are struggling now to get appointments with our doctors and our children into our schools of choice right now, increase the population by 25% and it will be impossible

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6412  Respondent: 15590529 / Linda Mumford  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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<td>Guildford’s local plan totally disregards the importance of green belt, protection of the environment and Surrey village life. Whilst we cannot stay stagnant and need development this needs to be measured, protect the environment and allow our village life to be maintained and to grow sensibly. Guildford shows it has considered none of these important issues in its local plan which has been poorly drawn up in the extreme.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I strongly object to the villages of Send and Ripley being removed from the green belt and in fact any villages in Surrey. Green belt was designed to prevent urban sprawl and Guildford seems intent to destroy this in our lifetime. It is arrogant of the Council in the extreme to present us with such a plan when they should be upholding the need to ensure our green belt remains permanent and intact for future generations, as required by the National Planning Policy Framework. Indeed local Councillors and Central Government were clear in their election promise to safe guard our green belt and you appear to be reneging on this promise for no special reasons. Where is your backbone Guildford you should be defending us not offering us up for sacrifice. Greedy developers will be quick to take advantage and we will be powerless to stop them.</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: PSLPP16/14420</th>
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</table>
Having been made aware of your plans for this area for the future I am so disappointed that you as professionals seem to have planned for a nightmare scenario for this area. You have a duty to those who live within your boundaries to present us with sensible and strategic decisions in your local plan. You have done neither and instead presented us with a plan that seems greedy in the extreme, threatens to destroy our village life and that takes no consideration of conservation of our precious Surrey flora and fauna.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14422  Respondent: 15590529 / Linda Mumford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 high number of houses intended for this area which is currently small villages connected by narrow country roads which are already overloaded, poor quality and impossible now to walk down safely. Trying to keep abreast of what Guildford’s intention is for the area requires an eye for attention to detail. Developments come and go and some are slipped in at the last moment to confuse and baffle us.

Come on Guildford you can do better than this, you have a duty to your residents to present us with sensible plans and not ones that seem to have been drawn up on the back of a cigarette packet to meet targets. If your local plan was marked it would get a FAIL from me. Give us something that doesn’t ruin the area with overdevelopment because you are too lazy or lacking in imagination to present something better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1585  Respondent: 15590529 / Linda Mumford  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): ()

Come on Guildford you can do better than this, you have a duty to your residents to present us with sensible plans and not ones that seem to have been drawn up on the back of a cigarette packet to meet targets. If your local plan was marked it would get a FAIL from me. Give us something that doesn’t ruin the area with overdevelopment because you are too lazy or lacking in imagination to present something better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPA16/3283</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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| Re: Station Parade designated as ‘District Centre’.  
This classification results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
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<tr>
<th>Comment ID: PSLPA16/3284</th>
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</table>
| Re: 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 eg., an increase of up to 35% in existing West Horsley households – greater than any other single area in the borough |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents:      |

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<th>Comment ID: PSLPS16/6423</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: 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) Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3286</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>Comment ID: PSLPA16/3287</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 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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Do you consider this section of the document; complies 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: PSLPS16/6429  Respondent: 15590593 / Johnathan Page  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?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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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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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.
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:

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/“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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**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 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: PSLPP16/13474  Respondent: 15590593 / Johnathan Page  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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POLICY H3 – Rural Exception Homes

I OBJECT 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:** PSLPP16/13468  **Respondent:** 15590593 / Johnathan Page  **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, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

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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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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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13459  Respondent: 15590593 / Johnathan Page  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13460  Respondent: 15590593 / Johnathan Page  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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<th>Comment ID: PSLPP16/13457</th>
<th>Respondent: 15590593 / Johnathan Page</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 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 unsustainable due to
being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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: PSLPP16/13458  Respondent: 15590593 / Johnathan Page  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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 commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated
between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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:

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Comment ID: PSLPA16/3289  Respondent: 15590817 / Michael Kramer  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 you to provide my objections to the Proposed Submission Local Plan.

I am a resident of West Horsley and I am deeply dismayed by the scale of the building that is proposed in this area.

The summary for Horsley is:

- Removal of greenbelt land
- 35% additional housing by numbers
- New housing at a significantly higher density than is typical in these villages
- Development completed within 5 years without any proposed increase to supporting local amenities

When reviewing the data to support the proposed plans I find it very difficult to determine what evidence is behind the number and density of the housing proposed for this villages of Horsley. The source of the data to support population growth is absent.

The proposed plans will irrevocably change the Horsley villages. The local plan does not represent a plan that considers the character and sustainability of the village of Horsley.

I strongly urge the independant assessor to visit the villages of Horsley to see first hand how the village is today.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3291  Respondent: 15590849 / Nigel Freebody  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 2016 draft Local Plan for the proposed insetting (policy P2) of the green belt land within the villages of Ripley, Send and Clandon. The proposals fly directly in the face of the council’s stated objective to protect the local green belt land. “Most valuable green belt' will be a 'no, no’ in Guildford's local plan, borough council leader says” (quote from getSURREY, 15-Feb-2016. There are numerous existing brown field sites available within the borough and there is no need to irreversibly destroy valuable green belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6433  Respondent: 15590849 / Nigel Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the 2016 draft Local Plan for the proposed development of 400 homes at the Garlic Arch site on the Ripley/Send borders on the grounds that this proposal would include the destruction of ancient establish broad leave woodland and the large scale destruction of agricultural land. Both of these areas are an important part of the local green belt.

I object strongly to the 2016 draft Local Plan for the proposed development of 400 homes at the Garlic Arch site on the Ripley/Send borders on the grounds that both these areas are strategic for the natural absorption of local rainwater runoff. Even with these natural areas, the Environment Agency deemed it a necessity to spend considerable sums in 2006-2007 to protect Sendmarsh and Maple Roads from repeat flooding from Garlic Arch runoff. Calculations for these defences would NOT have taken into account the additional problems that would inevitable result from building over this natural ground abortion. If the proposal were to go ahead, Sendmarsh residents would be at a substantially greater risk of flooding and be severely disadvantaged by increased insurance premiums and devaluation of property.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6434  Respondent: 15590849 / Nigel Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

1748
Do you consider this section of the document; complies with 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 proposed development of 400 homes at the Garlic Arch site on the grounds that key local community services, including but not limited to GP surgeries/dental practices/schooling, are already overstretched. Such services do not have the capacity to sustain any substantial increase in local population as would inevitable result from the proposed additional housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6435   Respondent: 15590849 / Nigel Freebody   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 2016 draft Local Plan for the development of new industrial sites (under policy E2 and E5) in the Garlic Arch area. Existing brown field sites within the borough are already far better suited to new industrial developments without the need to destroy additional agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13477   Respondent: 15590849 / Nigel Freebody   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the manner in which the 2016 draft Local Plan which includes the wholesale destruction of green belt land, including substantial new developments, have been rushed through the local planning process without the due and proper consultation of local residents, environmental, utilities and other affected groups, giving all those concerned adequate time to adequately and effectively respond.

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 the 2016 draft Local Plan for the large scale development (under policy S1) of over 13,000 new houses within the local area. There appears to be no specific justification for these proposals and this scale of development with a confined area is unsustainable and totally disproportionate to the requirements with the immediate area. Whatever justifiable needs there may be for additional housing within the borough, these should be spread out proportionally and not unjustifiably be concentrated in this area.</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 removal, in the revised 2107 Local Plan, of a number of brown field areas in the A4 and A34 sites. This has and will continue to place undue pressure for the further destruction of Green Belt land to fulfil the growing need for additional housing.</td>
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Do you consider this section of the document; 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 2017 revised draft Local Plan for the proposed development of housing at Garlic Arch (site A43) on the Ripley/Send borders. The removal of the previous limit of 400 new homes leaves the site entirely open ended for additional destruction of Green Belt land. This is both ambiguous and unacceptable.

I object to the 2017 revised draft Local Plan for the expansion of previously proposed new industrial sites at Garlic Arch (site A43). Existing brown field sites within the borough are already far better suited to these industrial developments without the need to destroy additional Green Belt land.

I object to the 2017 revised draft Plan for inclusion under the development of Garlic Arch (site A43) of travelling showpeople plots with storage facilities. There is no justification for such inclusion within the Green Belt area and sacrifice of Green Belt land for this purpose seems inappropriate and cavalier.

I object to the 2017 revised draft Plan proposals for the number of showpeople plots at the Garlic Arch (site A43). The proposed allocation is disproportionate to the number of possible homes on the site as compared with other local development plans, such as the Wisley aerodrome site.

I strongly object to the maintained inclusion of the woodland area at Garlic Arch (site A43). There is absolutely no justification for the wholesale destruction of this well-established ancient woodland. At the very least, this woodland area should be removed entirely from any proposals for development of the remainder of the site.

I object strongly to the 2017 revised draft Local Plan for the proposed development of increased number of homes at the Garlic Arch (site A43) because, as outlined in previous objections, both these areas are strategic for the natural absorption of local rainwater runoff. Additional homes over and above the previously stated limit of 400 homes will only further exacerbate the water runoff problems and further increase the flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2553  Respondent: 15590849 / Nigel Freebody  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 reference to a potential waste management facility at Burnt Common (site A58). No specific details have been published on this facility. However there can be no justification to sacrifice Green Belt land for such purposed whilst there are many alternative brown filed sites available in the borough.

I object to the removal of the limitation, previously set at 7,000 sq.m, to the industrial floorspace proposals at Burnt Common (site A58). The revised terminology of “at least 7,000 sq.m” is both ambiguous and potentially significantly damaging to the local environment.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/953  Respondent: 15590849 / Nigel Freebody  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 2017 revised draft Local Plan for the proposed insetting (policy P2) of the green belt land within the villages of Ripley, Send and Clandon. The revised proposals appear to make no concessions to any of the thousands of previously submitted objections made in respect to the 2016 draft plan. Rather, the proposed amendments seek to expand the proposed developments.

I object to the manner in which the 2017 revised draft Local Plan, which still includes the wholesale destruction of Green Belt land, has been rushed through the local planning process without any apparent due consideration to or concession to all the many previous objections raised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3290  Respondent: 15590881 / David Godden  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.
**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:**

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**Comment ID:** PSLPA16/3292  **Respondent:** 15590881 / David Godden  **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 GRA state the reasons why the policy of maintaining the green spaces and not merging Burpham into a double sized sprawl meeting the boundary of West Clandon has not been met.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7668  **Respondent:** 15590881 / David Godden  **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 very strongly to the unsustainable Draft Local Plan 2016, which is clearly based on flawed data.

I support the Guildford Residents’ Association (GRA) response to the Draft Local Plan 2016 and am opposed to Guildford expanding by a quarter. No exceptional circumstances to allow unnecessary development have been shown by Borough Council to warrant the 2,000 house and traveller sites being built on Gosden Hill Farm.

The GRA state the reasons why the policy of maintaining the green spaces and not merging Burpham into a double sized sprawl meeting the boundary of West Clandon has not been met.

Finally, GBC did not properly account for how the report’s figures were arrived at and allowed too short a period of consultation making the Draft Local plan unaccountable and is therefore unsound.

**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): ()

**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:

**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: PSLPS16/6436  Respondent: 15591041 / Dan 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): ()

No exceptional circumstances to allow unnecessary development have been shown by Borough Council to warrant the 2,000 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:

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Comment ID: PSLPP16/13481  Respondent: 15591041 / Dan 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 object very strongly to the unsustainable Draft Local Plan 2016, which is based on flawed data.

I support the Guildford Residents’ Association (GRA) response to the Draft Local Plan 2016 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:

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Comment ID: SQLP16/1586  Respondent: 15591041 / Dan Gordon  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): ()

GBC did not properly account for how the report’s figures were arrived at and allowed too short a period of consultation making the Draft Local plan unaccountable and is therefore unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3294  Respondent: 15591105 / David Armstrong  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 would like to formally register my objection to the Guildford Local Plan 2016. I am a resident of Chilworth and object to the insetting of my village along with the surrounding 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: PSLPA16/3298  Respondent: 15591169 / Ollie Deatker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation.

My comments are set out in this letter. I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not accept the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period. I also note that the Proposed Submission Local Plan includes the statement “We
will continue to protect the Metropolitan Green Belt”. I fully and un-equivocally support this policy. The Green Belt is a national asset which should be treasured; the whole character of Surrey will change over time if GBC allow the degradation of the Green Belt. If every time there is pressure to build housing, GBC uses the Green Belt as an area for negotiation, the unique character of Surrey will be lost forever and the generations that follow will look at this moment as a trigger point in the decline of Surrey. 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 here currently, let alone the proposed developments in the Local Plan.

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt

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. Therefore there is no need to change its status.

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.
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. i) There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal. I, accordingly, OBJECT to this proposed boundary change.

1. ii) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such I believe this is an invalid proposal. I accordingly OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe Local Plan Response 13.06.16 the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt I OBJECT to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

INFRASTRUCTURE POLICIES This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES I1, I2 & I3 These three policies cover Infrastructure & 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 give us cause for concern. 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. I would make the following comments specifically about infrastructure in East Horsley today:
• Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;

• The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;

• Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains. Any substantial development as indicated within the Local Plan will increase hard surfaces in the area and therefore the rainfall runoff will increase into local watercourses and exasperate localised flooding.

• The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;

• There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and

• The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

Train services to and from Horsley to London on the ‘Guildford via Cobham’ line are already at full capacity at peak times. The current service has to be substantially improved BEFORE allowing further development. Such improvements should include additional train services and additional stations to support new communities.

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, South West Trains or utility companies. Surely GBC must see the infrastructure improved first before approving any new developments.

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 Local Plan Response 13.06.16 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, I believe that this needs to be implemented 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 therefore OBJECT to the infrastructure proposals on these grounds. I also OBJECT to the proposals for infrastructure in that they do not meet the stated
objective of providing infrastructure to support the proposed developments.

There is a legacy of approving development without the appropriate infrastructure, and the infrastructure lags to the point it cannot cope, whether this schools, trains, roads or utilities. GBC in their local plan set out a vision of development, however the details of the infrastructure upgrades needed to today are not firm legal commitments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15591169 / Ollie Deatker</th>
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**POLICY A35: Land at former Wisley Airfield Policy**

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

Summary Surrey is a beautiful county enjoyed by the people from London and further afield, the beauty comes from the structure of open land, green fields and villages, which has been preserved through planning constraints and the Green Belt. The GBC Local Plan sets out to erode the green spaces of Surrey, put strain onto the infrastructure already under strain, and allow housing developments on a scale that is not justified.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15591201 / Matthew Deatker</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3303  **Respondent:** 15591201 / Matthew Deatker  **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): ()

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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 therefore OBJECT to the infrastructure proposals on these grounds. I also OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

There is a legacy of approving development without the appropriate infrastructure, and the infrastructure lags to the point it cannot cope, whether this schools, trains, roads or utilities. GBC in their local plan set out a vision of development, however the details of the infrastructure upgrades needed to today are not firm legal commitments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6446  Respondent: 15591201 / Matthew Deatker  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: Land at former Wisley Airfield Policy

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

Summary Surrey is a beautiful county enjoyed by the people from London and further afield, the beauty comes from the structure of open land, green fields and villages, which has been preserved through planning constraints and the Green Belt. The GBC Local Plan sets out to erode the green spaces of Surrey, put strain onto the infrastructure already under strain, and allow housing developments on a scale that is not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6454  Respondent: 15591393 / Carol Williams  Agent:
Objected 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 2,100 dwellings

I object to the draft Local Plan for the following reasons:

1. I object to the removal of the Airfield (FWA/TFM) from the Green Belt. The Green Belt was established to prevent urban sprawl from London and no exceptional circumstances have been established to warrant removal of this land from the Green Belt.

2. I object to the impact this development would have on transport and local roads, particularly:

   1. The A3 and M25 roads are already congested and, when there are problems on either of these roads, the surrounding areas come to a standstill. This happens frequently.
   2. The car parks at Effingham Junction and Horsley Stations are very often full. The detrimental impact of a further possible 4,000 cars cannot be overstated.
   3. The developers seem to think that the local population will suddenly take to cycling or walking, even though there are no cycle lanes and a lack of pedestrian footpaths.

3. I object to the fact that air pollution has not been given consideration. I understand that the air quality at the M25/A3 junction is in excess of EU-permitted levels and this can only become worse with more traffic.

4. I object to the fact that this site has been included as the planning application was unanimously rejected by the Planning Committee.

I cannot understand why Guildford Borough Council still feel this site should be included when there have been many serious concerns raised by a number of authoritative sources, including Highways England, Thames Water, NATS and the Environment Agency. There are brownfield sites in the area which would benefit from development without affecting historic local villages and causing untold problems for the local communities.

I trust 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 reasons:

1. I object to the removal of the Airfield (FWA/TFM) from the Green Belt. The Green Belt was established to prevent urban sprawl from London and no exceptional circumstances have been established to warrant removal of this land from the Green Belt.

2. I object to the impact this development would have on transport and local roads, particularly

   1. The A3 and M25 roads are already congested and, when there are problems on either of these roads, the surrounding areas come to a standstill. This happens frequently.
   2. The car parks at Effingham Junction and Horsley Stations are very often full. The detrimental impact of a further possible 4,000 cars cannot be overstated.
   3. The developers seem to think that the local population will suddenly take to cycling or walking, even though there are no cycle lanes and a lack of pedestrian footpaths.

3. I object to the fact that air pollution has not been given consideration. I understand that the air quality at the M25/A3 junction is in excess of EU-permitted levels and this can only become worse with more traffic.

4. I object to the fact that this site has been included as the planning application was unanimously rejected by the Planning Committee.

I cannot understand why Guildford Borough Council still feel this site should be included when there have been many serious concerns raised by a number of authoritative sources, including Highways England, Thames Water, NATS and the Environment Agency. There are brownfield sites in the area which would benefit from development without affecting historic local villages and causing untold problems for the local communities.

I trust 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: PSLPS16/6456  Respondent: 15591457 / Helen Channon  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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<th>Respondent:</th>
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<th>Respondent: 15591585 / John Thompson</th>
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I am stunned that having rejected the proposed development of Three Farms Meadows at the Council Planning Meeting, we, yet again, having to write to the GBC to reiterate the same things that applied from the start; the same things that were totally rejected before. So why are they on the table again? This, however, being the case, I include my objections to the Proposed Local Plan's inclusion of Three Farms Meadows below:

I object to the encroachment on the green belt, for which there is no justifiable reason. There has been no real determination to use brown field sites (because of reduced profits for faceless property speculators)

I object as our road systems, already dangerously over-used, will not be able to cope with the increased traffic. I live in a lane in Ripley which has no pavements and is already a dangerous place to walk, due to the volume of traffic. The same is true of many of the residential roads in the area.

I object because the increased traffic will result in increased pollution and have a detrimental impact on the health of local residents.

I object because the proposed building on this site would result in this part of Surrey becoming part of the urban sprawl from London.

I object as there is no real improvement to local infrastructure to cope with this vast influx of people and that the figures presented do not reflect the true number of houses required

I object as there are no plans for how to deal with increased sewage, water supplies and run offs.

I object as the creation of a town on the The Three Meadows site will not provide additional school places for years, long after the houses begin to be built. This will create problems for local schools. Similarly, there are no plans for another Doctors’ Surgery.

I object to the local plan because The GBC are still dealing with a company registered in the Cayman Islands and, therefore, anonymous money people. They are only interested in getting outline planning permission so they can sell on their totally inadequate proposals for a profit of several hundred million pounds. They will then beat a hasty retreat and leave the whole sorry mess to be put together by somebody else and to incarcerate hapless people for the foreseeable decades into overpriced and under-planned mis-housing. We know that our villages have to grow, but in an organic way, not by totally engulfing them into a sprawling new town.

The Borough Councillors are our representatives and, as such, should represent the views of those who elected them. Election promises were made to protect the green belt which are now being flagrantly flouted. Listen to the views of the people you represent and remove Three Farm Meadows from the proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. I object to the hiding of development by “deferment” (A25, A26, A43)
This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and
ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3256  Respondent: 15591585 / John Thompson  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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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:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3258  Respondent: 15591585 / John Thompson  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): ()

9. I object to removal of Brownfield site (A34) from the Plan
Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Once again, I find that I must object to the Guildford Borough Council's inclusion of Three Farms Meadows in the 2017 Local Plan. As someone who attended the council meeting in which all proposed plans to develop this site were unanimously rejected for very good reasons, I find it hard to understand how it can still be included in this draft. As a resident of Ripley I know that if this development goes ahead, the very nature of this corner of the borough will be destroyed. I will render it nothing more than a suburb of London. The council seems to have no qualms about destroying the green belt which, by it's very nature, is designed to ensure that the urban sprawl is not allowed to simply go unchecked. This, along with other planned developments in Send and Clandon will result in the end of village life here. The villages will simply merge into a new town.

I have seen projected plans for the development of this area and believe that there is a cynical use of green belt land which can be bought cheaply but, once planning has been granted, can then be sold on for a premium. There are those who seek only to make a large profit. The real needs and wishes of the communities involved are simply ignored. Green belt is being exploited in preference to genuine brown field sites for this reason. Those who stand to make vast amounts from this site are registered in the Cayman Islands. They are not paying UK tax and have no interest in improving the lives of those of us who live in the borough.

My reasons for objecting to Policy A35, Three Farms Meadows, in the draft 2017 Local Plan are as follows:

I object to the inclusion of this site in the 2017 Local Plan because it will be adjacent to the most congested stretch of roads in the country, junction 10 of the M25. In addition to this, the neighbouring roads, many of which are little more than country lanes, which already carry a high volume of traffic, will be negatively impacted. Living in a narrow lane, which is already a rat run, I know only too well of the impact the development would have. When the increased traffic that is projected due to increased visitor numbers to RHS Wisley is added to this the result can only cause misery for those living here.

I object to the inclusion of this site in the 2017 Local Plan because alongside the very significant increase in traffic movements, there will be a very significant increase in air pollution. The quality of our air as a result of the heavy traffic on the M25 and A3 already fails to meet suggested limits. The increase in asthma, particularly amongst children in the area, is disturbing. As a child brought up here, I can attest that when I was a child asthma was unusual, not the norm as it has almost become today.

I object to the inclusion of this site in the 2017 Local Plan because the access to the train network from this site is highly problematic. The roads surrounding the development are little more than country lanes and the suggested solution, that commuters could walk or cycle to the nearest railway station, is ridiculous. To suggest a bus service to Horsley again is not viable. The prospect of walkers, cyclists and buses using these narrow roads is completely unrealistic. These lanes and unlit, have no footpaths, are barely wide enough for two vehicles to pass and, therefore, cycle lanes would be impossible.

I object to the inclusion of this site in the 2017 Local Plan because the increase in area is on the south of the site and faces the Surrey Hills ANOB. The projected building on this area, in places several storeys high, would be a true blot on the landscape of this protected area. The removal of a further 3.1 hectares of green belt land is totally unjustified and unnecessary.

I object to the inclusion of this site in the 2017 Local Plan because one of the major issues is the provision for dealing with the large amount of sewage that such a site will generate. This will prohibit the plan from contributing to the five year housing projection.
I object to the inclusion of this site in the 2017 Local Plan because the housing number and the fact that the council has not used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA.

I object to the inclusion of policy S2 in the 2017 Local Plan because it states that the figures in the Annual Housing Target Table add up to 12,426, when, in fact, they add up to 9,810. There seems no account taken of the missing 2,616. This anomaly suggests that the figures are not to be trusted.

I object to the inclusion of this site in the 2017 Local Plan because the council has failed totally to take into account all of the objections raised by those they purport to represent. This is to disregard the fact that they are our democratically elected representatives and have a responsibility to act upon the wishes of the electorate. The promise by those on the council when elected was to protect the green belt. This promise is being flagrantly broken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3257  Respondent: 15591585 / John Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. 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: pslp172/3260  Respondent: 15591585 / John Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. 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: pslp172/3253  Respondent: 15591585 / John Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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.

2. 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.

4. 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.

5. 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.

7. The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch
GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were
a) The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) [ than the Burnt Common site did ]”
b) The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.
14. I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

The most distressing element of this plan is that such a large proportion of the overall proposed development is being targeted on this small part of the borough. It is simply disproportionate and there is little understanding being shown by those elected to represent our views. I trust, therefore, that these objections will be given your full attention and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3259  Respondent: 15591585 / John Thompson  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): ()

10. 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: pslp171/1549  Respondent: 15591585 / John Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
12. 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?

13. 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?
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) The plan has been based on the intention of adding 13,860 new homes to Guildford Borough over the 2013 - 2033 period, this represents a massive increase of 25% of the housing provision in just 20 years, the need for this huge increase has not been explained or justified, as neither has the basis on which the SHMA has been calculated. It is also the case again without justification that GBC has enhanced this figure to a level which is 70% higher than the official national estimates for population growth than the Borough. The GBC has no mandate from its residents to provide this additional level of housing and therefore has completely departed from the ethos of “localism” in planning policy.

The effect of Brexit will be to reduce the demand for housing nationally and the ability of the building industry to provide it, making GBC’s figures even more extraordinary.

2) I object to a plan which proposes that over 70% of the new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are for no good reason being forgotten and ignored.

3) I object to the disproportionate allocation of this new housing in this particular part of the borough which means that over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt, and its inclusion in the Local Plan as a site suitable for development. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The proposed removal of this site from the Green Belt by GBC only a few months after Wisley Property Investments Ltd.’s (WPIIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers is totally hypocritical, lacking in logic and integrity, and would seem to indicate the existence of an unduly coercive influence by the associated developers on some council members.

From what I have seen of the Local Plan Guildford’s planners, councillors and external consultants seems to have forgotten (or not be aware of) what gives the Borough and Surrey as a whole its unique character and the attributes which currently make it one of the most desirable places in the country to live in.

The first of these is of course that a good proportion of the Borough and indeed the county is countryside protected by the Green Belt, a piece of planning legislation which has given London its “Lungs” and prevented an unrestricted urban sprawl envied by most of the world’s capital cities.

The second is that quintessential element of the British countryside, small villages dotted about the county each with its own character, vernacular architecture, church and village green and individual communities.

The third attribute is the space that we enjoy by choosing to live in a rural and not an urban environment.

The proposals shown in the Local Plan spell out the destruction of what causes this part of Surrey to be unique and will devalue the quality of life of many of the Borough’s residents particularly in the Horsleys, Ockham, Ripley and Send.

5) For these reasons I also object to the proposed extension of the Settlement Boundaries of the Horsleys.

6) I also object to the Local Plan proposals for any significant increase in the population of the Horsleys, Ockham, Ripley and Send. Notwithstanding the effect of proposed development in these villages the provision of over 2,000 homes on the Former Wisley Airfield will add some 5,000 to 6,000 people to the area and probably 3,000 or more extra vehicles.
This new community will need to get to their workplaces and schools and as there is no train station proposed for Wisley Airfield they will have to travel by car either by driving to Guildford or London or to the train stations at Horsley and Cobham. This will involve them accessing the A3 where the 3,000 vehicles would first have to go south to the Ripley/Ockham junction before going east to Horsley Station or north to London and Cobham.

At the present time at rush hour there are often queues northbound between the Ripley/Ockham roundabout and the Cobham roundabout and the addition of a further 3,000 vehicles at this time would cause these roundabouts to seize up and effectively close the A3. Those motorists lucky enough to complete their journeys via the A3 will find that there will not be any spare car parking at either of the stations (where there is no room to extend either the car parking or the platforms) and even if by chance they did find a space in the car park they probably would not find one on the train.

In the villages most of the primary foul water, surface water, electricity, gas, and telephone services are 80 or more years old, close to capacity and near to the end of their effective life. My personal experience of this is that in the six years that I have lived in Ockham Road South East Horsley the electrical supply to my part of the road has failed twice, once for five days and the second time for two days due as the electricity supplier told me, to the age and capacity of the mains cables.

Although new energy saving technologies and elements like sustainable underground drainage systems can to a degree reduce the impact of any new developments ultimately they still have to be provided with services form the existing primary utilities infrastructure which will not be able to cope or be renewed by the monies obtained from the anticipated community infrastructure levies.

Other resources which will be overwhelmed will of course be the local healthcare services (where appointments are already difficult to get) and many will be aware of the near impossibility of parking at Royal Surrey County Hospital. It is also the case that most of the local “country” roads already have difficulty in withstanding the onslaught of potholes following each winter, without the added attrition of 100’s of heavy good vehicles which will be unleashed when any significant development works start.

I also object to the classification of the East Horsley Station Parade as a designated “District Centre” this is pure artistic licence by the Plans authors, it is just a small shopping parade.

I trust that these objections will be fully considered and that the Local Plan will be redrawn to reflect the views and true needs of the local electorate, the parish councils and local action groups and not politicians with alternative agendas.

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.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. This land serves a vital role in protecting against urban sprawl from London. Development on this land would create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing this 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 draft Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the FWA/TFM), an area that at present has only 0.3% of the population of GBC.

5) I object to the threat the current draft Local Plan poses to the historic rural village of Ockham. The current draft plan contemplates that a conservation-protected village of 159 homes (many of which are grade 2 listed, with a grade 1 listed church), with narrow, winding country lanes (which are weight-restricted), no streetlights and very few pavements should 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 that such a development would inevitably entail. The local infrastructure, including the roads and railway networks, schools, medical facilities and even local drainage facilities cannot support such a contemplated development.

7) I object to:
   1. The assertion that such a development would result in a meaningful shift to cycling and walking. The location of the FWA/TFM, surrounded as it is by narrow, winding country lanes, with no footpaths, remote from shops and the nearest commuter stations, mean that this assertion is demonstrably wrong. Even claims about the time it would take to cycle from the FWA/TFM to Effingham Junction station have been shown to be wrong.
   1. The increased volume of car traffic that such a development would entail. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the narrow country lanes that surround the FWA/TFM.
   1. The heavy traffic that such a development would entail during many years of construction, on our narrow, winding weight-restricted lanes.
   1. The danger that such traffic would pose to those who use these lanes.
   1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school as part of the possible development on the FWA/TFM would result in still further congestion at the M25/A3 junction, as well as on local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   1. The lack of suitable public transport. The local railway stations of Effingham and Horsley cannot cope with the increase in passengers that such a development would entail, and car parking is already at capacity.

8) I object to the fact that insufficient consideration has been given to the environment, ecological and agricultural value of the FWA/TFM - the Thames Basin Heaths' Special Protection Area (SPA) adjoins the FWA/TFM, as does a Site of Special Scientific Interest (SSSI). The nature conservation designation SNCI (Site of Nature Conservation Interest) applies to
almost all of the FWA/TFM. Rare flora and fauna abound and should continue to be protected. This land is predominantly high grade agricultural land which should continue to be cultivated.

9) I object to the fact that air quality concerns have not been taken sufficiently seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of legal limits. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

10) I object to the fact that no account seems to be being taken of the effect of acid deposition on the Thames Basin Heaths' SPA and its irreversible impact on the habitats of the many rare species of flora and fauna which the various nature conservation designations that apply to the FWA/TFM are designed to protect.

11) 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 reasons given to the question 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.

12) I object to the continued inclusion in the draft local plan of the FWA/TFM: a planning application for residential development of this land was unanimously rejected by GBC’s Planning Committee in April 2016: 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's Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about the proposed residential development of this land have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

13) I object to the inclusion of the FWA/TFM in the draft plan: it fails to take account of the value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which at least 19.3ha is classified as best and most versatile land).

14) I object to the inclusion of the FWA/TFM in the draft plan: claims have been made that FWA/TFM should be regarded as “brownfield” or "previously developed land". I believe these to be erroneous. The land is Green Belt land. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA, and the remainder of the old runway is (of course) flat and at ground level, meaning that any development would have a “major impact on the openness of the area”. Much evidence exists that the adverse consequences of development of this land, including damage to the ecology of, e.g., the SPA, cannot be mitigated.

15) I object to the inclusion of the FWA/TFM in the draft plan: the impossibility in practical terms of creating a sustainable development on the FWA/TFM is further demonstrated by the historical use of, and lack of development of, this land and most recently by the inability of the current landowner/ developer and its many experts and advisers to come up with a sustainable development proposal despite numerous attempts over an extended period - unanimously rejected by GBC’s Planning Committee - on the recommendation of its Planning Officers - in April 2016.

CONCLUSION

The above objections graphically demonstrate why the FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make this land totally unsuitable for any kind of significant development – as has been consistently argued.

The fact that the draft Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and decisions, disregards local and not-so-local opinion, and imposes significant cost and anxiety on local communities.

I continue to strongly OBJECT to:

the inclusion of the FWA/TFM and other parts of Ockham Parish in the draft local plan as possible sites for housing development and
their proposed exclusion from the Green Belt.

I trust that these objections will be fully considered and that the Former Wisley Airfield/Three Farms Meadow, Allocation A35, will now be removed from the draft Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/6466  **Respondent:** 15591681 / Katie Gill  **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. This land serves a vital role in protecting against urban sprawl from London. Development on this land would create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing this 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 draft Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the FWA/TFM), an area that at present has only 0.3% of the population of GBC.

5) I object to the threat the current draft Local Plan poses to the historic rural village of Ockham. The current draft plan contemplates that a conservation-protected village of 159 homes (many of which are grade 2 listed, with a grade 1 listed church), with narrow, winding country lanes (which are weight-restricted), no streetlights and very few pavements should 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 that such a development would inevitably entail. The local infrastructure, including the roads and railway networks, schools, medical facilities and even local drainage facilities cannot support such a contemplated development.
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1. The assertion that such a development would result in a meaningful shift to cycling and walking. The location of the FWA/TFM, surrounded as it is by narrow, winding country lanes, with no footpaths, remote from shops and the nearest commuter stations, mean that this assertion is demonstrably wrong. Even claims about the time it would take to cycle from the FWA/TFM to Effingham Junction station have been shown to be wrong.

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I trust that these objections will be fully considered and that the Former Wisley Airfield/ Three Farms Meadow, Allocation A35, will now be removed from the draft 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: PSLPS16/6467</th>
<th>Respondent: 15591745 / Laura Greaves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21</td>
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<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing regarding Policy A21 regarding Westborough Allotments. I would like to express my support that the allotment site is protected from development and the lower access to the site from Westway remains as it is.

Allotments provide an enormous benefit to the local community. They promote physical activity, healthy eating and provide a form of relaxation and stress relief to local residents. A number of the tenants are elderly and having an allotment encourages them to remain fitter and independent for longer. The allotments also support social interaction and allow people to become involved with their local community. The green and natural environment has also been proven to have a beneficial effect on health and wellbeing.

Westborough Allotments are particularly invested in the local community, having their own self-help group Westborough Allotments Self Help Association (WASHA), who run an education programme for the local school who won a Gold award in the 2015 Guildford in Bloom competition in the best allotment category. They also provide support to new and existing tenants to make the most of their plots.

The lower access to the plot, from Westway, is the only access point suitable for vehicles. There is other vehicular access but the allotment site slopes dramatically from this point so it would not be safe for a vehicle such as an ambulance to use. It is essential the lower vehicular access point is retained so in the event of an accident the emergency services can gain access to the allotments. This access point is also regularly used by tenants transporting large or heavy materials to their plots, something which elderly tenants particularly rely on.

The allotments also provide vital green space for the local residents and wildlife. The noise and disruption that any development brings would have a detrimental effect on the area. Consideration should also be given to any neighbouring development to ensure there is as little disruption as possible. The local residents can live with and understand the disruption but the wildlife cannot and any nearby developments should be managed to have the minimum impact.

Further to this point I would suggest that allotments be specifically included in the list of green and blue spaces listed in Policy I4 in the Proposed Submission Local Plan. With the current rate of housing development it is essential that any sites which meet this definition are protected, particularly in areas like Guildford which are already built up. Allotments also provide a very unique environment which meet the needs of relaxation, exercise, recreation, visual amenity, wildlife habitat and agriculture in a way that other open spaces do not. They also provide a valuable tool with which to teach future generations the value of these open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6468  Respondent: 15591777 / Joanne Miethke  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 object to Guildford Borough Council's new draft local plan A46 Normandy & Flexford. We have lived on the Guildford Road in Normandy for 18 years and consequently have first-hand experience of how increasingly busy the road has become over that time. To now learn that the draft local plan is to double the size of the village in Normandy, adding 1,100 new homes in addition to a secondary school is extremely alarming. Just imagine all the extra traffic, increased danger, noise, pollution and congestion that would cause on local roads (not to mention all the years of construction prior.)
I object to the claimed need for a secondary school on this Green Belt site. The school would not be required if the site were not allocated for housing development so both cancel one another out. There is no proven need for a new school as expansions are planned at existing schools in the borough and a new technical college will be available from 2018.

Proposals for housing development all around us, i.e. Wood Street Village, Fairlands and Holly Lane mean that our beautiful rural location will be destroyed. What are the "exceptional circumstances" that justify the proposed release of site A46 from the Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6469  Respondent:  15591841 / Arthur Perkins  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.
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- 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:** PSLPA16/3316  **Respondent:** 15591873 / Stephenie McKenna-Insalco  **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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1785
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Attached documents:

Comment ID: PSLPS16/6473  Respondent: 15591873 / Stephenie McKenna-Insalco  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.

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 urbanstyle 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
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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

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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

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I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/13533  Respondent: 15591873 / Stephenie McKenna-Insalco  Agent:

Document: Proposed Submission Local Plan: strategy 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 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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Attached documents:

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Comment ID: PSLPS16/6490  Respondent: 15593377 / Vivienne Colvill  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.

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 particularly object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPA16/3322  **Respondent:** 15593409 / Anita Pomery  **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):** ()

Where does GBC get their figures for a need of 632 houses per year? Why is GBC reluctant to explain the figures? In my view the figures are not based on needs of local people – more like a need from London overspill / European influx. Other boroughs are applying constraints to overall housing growth. Why is GBC not doing likewise?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/3321  **Respondent:** 15593409 / Anita Pomery  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area

Do you consider this section of the 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 very strongly to GBC’s draft local plan June 2016.

The plan is flawed and unsound and yet again it would appear GBC has not and does not listen to local people’s fears of the sheer decimation of the green belt let alone the utter gridlock such a plan will have on Burpham and surrounding villages. GBC went ahead and allowed Aldi to build a store even though local people objected to the plan and it is causing havoc on the already congested London road. We didn’t need the store and the site would have served a better purpose if kept as a family pub/restaurant. I have lived in Burpham for over 30 years and have witnessed the building of several housing developments in the area. This has had an impact on the volume of traffic through Burpham from Guildford direction and from the exit slip road from the A3 either heading for Woking and beyond or 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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<td>To have a housing development of over 2000 houses plus industry and traveler sites on Gosden farm with no sound and definite plans to route this traffic away from Burgham is short sighted in the extreme. I live very close to the A3 which is under extreme pressure from traffic 24x7. I should know because I hear the noise from it. How does GBC plan to keep A3 traffic moving with another 14,000 - 28,000+ cars using it?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>For GBC to even consider building over 14,000 houses in Burgham and surrounding villages much of which will be on GREENBELT is an atrocity and to potentially lose the identity of beautiful villages such as Ripley, Clandon and Send is something that should not be allowed to happen.</td>
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I would like to register my concern with a number of the proposals laid out in the proposed Local Plan, which I feel will have lasting detrimental consequences for West Horsley and the surrounding countryside.

My concerns are as follows:

- The proposed scale of development in West Horsley will result in dramatic permanent change to the character of the area, and is unsustainable given the local infrastructure. The local schools are over-subscribed and full every year; the doctors surgery in East Horsley is invariably busy today and appointments hard to come by; the roads (especially Ockham Road North/South and East Lane) are very busy at peak times; and the basic services, especially sewerage/drainage, are already incapable of dealing with the current demand as the widespread flooding that invariably accompanies periods of heavy rainfall in the village shows (further development will mean more surface water runoff, and more immediate demand on outdated sewers and storm drains which in turn will mean more flash flood episodes around the village).

- Additionally, there is no proven case for the supposed demand for such a large number of houses in this area. West Horsley Parish Council’s own analysis suggests that approximately 20 properties would be needed in order to meet demand from local people otherwise unable to stay living in the village - a development of that scale and for that explicit purpose would be entirely understood, but what is proposed is anything but. It is unreasonable to expect a few villages in the Borough (of which West Horsley is the most extreme case) to take a share of the burden of future development that is wholly disproportionate to the scale of those villages today, when the equivalent number of houses added to already well-established urban centres (e.g. Guildford) would result in far less significant change to the character of the area.

- Removing the Horsleys from the Green Belt is fundamentally unjustified and contrary to the stated Government policy (see Hansard ref. Queen’s Speech, 5th June 2014). GBC’s need to find space for housing does not constitute an “exceptional circumstance” that could in principle otherwise justify the deletion of the Green Belt designation. Removing the village(s) from the Green Belt will lead to further urban sprawl and the unique character and community of East and West Horsley, as well as that of much of the surrounding countryside, will be lost forever to future generations. It is furthermore key to note that the National Trust aspire to pursue the further northward extension of the current Surrey Hills AONB to cover this area, which provides recognition at the most significant level of the importance of the rural nature of this region.

- The scale of the proposed Wisley Airfield development is hugely out of keeping with the local area, and a development of that magnitude will have an unsustainable impact on our shared infrastructure, not least on the A3 which already experiences long tailbacks at peak times around the Ockham Park and M25 junctions (which will be those most burdened by the addition of such a large, new town on the airfield site) and on the already overcrowded South West Trains railway service from Horsley into London and Guildford.

I trust that you will take this opportunity to revise these points in the Local Plan, and insodoing ensure that future generations are able to benefit from the rurality of this area as much as previous generations have done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to the 2016 Draft Local Plan by Guildford Borough Council (GBC) to remove Ripley, Send and Clandon from the Green Belt:

- Traffic in the area is already ridiculous at peak times

- The health infrastructure is already being challenges as our family recently experienced a 6 month wait time for an important appointment

- The quality of air is very important and it is crucial to have sufficient green land in a place so close to London, which has already got plenty of environmental challenges.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13583  Respondent: 15593633 / Ila-Maria Patermann  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): ()

We are also worried about the increased number of traffic resulting form this creating more air polution, which will particularly affect children and people with allergies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13585  Respondent: 15593633 / Ila-Maria Patermann  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 strongly believe in protecting our environment, being members of the Surrey Wildlife Trust and think our heritage assets and wildlife need protection to counterbalance the effects of global warming and environmental changes that are already creating weather events across the UK and locally that have a very negative impact on people around us nearly every year now. We therefore object to the site A45 The Talbot, the A57 The Paddocks and the site A43 Garlick's Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We use the green belt regularly for walks and recreation and Wisley, Newland's Corner and Send are the main places for our daughter's wildlife explorations and favourite playgrounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We particularly object to the allocation of land to the strategic sites of Garlicks Arch (Ripley/Send border), Gosden Hill (Clandon) and Wisley Airfield, which we believe will have a particularly bad impact on the communities and wild life in the area.

We also think that proposing the erection of more than 6,500 houses between the M25 and Burpham is a shocking idea as it will create an even bigger traffic problem for me commuting in and out of Guildford. The sheer size of this proposal is disproportionate and unfair to the people in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We strongly request that you extend the consultation period by at least another 4 weeks as we don't think the current consultation period is fair on the large number of people that will be negatively impacted by your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3330  Respondent: 15593665 / Thomas Cope  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 specifically to Ripley and Send Villages 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 on conurbation. Local councillors and central government gave a clear election promise to protect Green Belt ad 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:

Comment ID: PSLPS16/6509  Respondent: 15593665 / Thomas Cope  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 the inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take and more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been granted for 64 apartments at the Tannery and for building a marina, both of which will generate additional heavy traffic. The lane cannot take any more traffic. 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:
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. 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 over exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt is not needed.

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. 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 from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. This must be avoided.

I 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: PSLPP16/13590  Respondent: 15593665 / Thomas Cope  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 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: SQLP16/1606  Respondent: 15593665 / Thomas Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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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:
I object to the Policy A43 change at Garlick's Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no "exceptional circumstances" exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3340  Respondent: 15593729 / Martin Warwick  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: PSLPA16/3341  Respondent: 15593729 / Martin Warwick  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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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>

** 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:**

<table>
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</table>

** 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: PSLPP16/13632 | Respondent: 15593729 / Martin Warwick | 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:

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** Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 **

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** Answer (if comment is on questions 1-7 of the questionnaire): () **

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5) **

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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** 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: PSLPP16/13643  Respondent: 15593729 / Martin Warwick  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: PSLPP16/13647  Respondent: 15593729 / Martin Warwick  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:
** 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:

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** 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:

---

** 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:** PSLPA16/3339  **Respondent:** 15593761 / Celestyn Kwapisiewicz  **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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**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:** PSLPA16/3342  **Respondent:** 15593761 / Celestyn Kwapisiewicz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**I object to the 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:** PSLPS16/6517  **Respondent:** 15593761 / Celestyn Kwapisiewicz  **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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Comment ID: PSLPS16/6515  Respondent: 15593761 / Celestyn Kwapisiewicz  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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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/13633  Respondent: 15593761 / Celestyn Kwapisiewicz  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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?

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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.

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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: PSLPP16/13645  Respondent: 15593761 / Celestyn Kwapisiewicz  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:

Comment ID: PSLPP16/13634  Respondent: 15593761 / Celestyn Kwapisiewicz  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13625  Respondent: 15593761 / Celestyn Kwapisiewicz  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to not protecting the Green Belt (Policy P2)

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: PSLPP16/13629  Respondent: 15593761 / Celestyn Kwapisiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13622  Respondent: 15593761 / Celestyn Kwapisiewicz  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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The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructurture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

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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 strongly object to the proposed Normandy development on Green Belt land.

The proposed development would cause chaos on the local country roads especially on the two country lanes Westwood Lane and Glaziers Lane which bound two sides of the proposed development which are boxed in by two railway bridges. One of the bridges is only one car per time and the other a very narrow bridge over the railway that has houses surrounding the railway land. Thus resulting in major congestion as the 1100 new houses will have 2000 or more vehicles and traffic pickups and drop offs to and from the proposed 1500 pupil school. The A323 is already backing up at peak times because of the volume of existing traffic and the railway crossing at Ash blocking the twisty country road through Normandy.
Can you explain why we need a new school in Normandy with 1500 places? I cannot see that there is a good argument for such a development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3345  Respondent: 15594753 / Charles Defreitas  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 removal of West Horsley from the green belt. There appears to be no exceptional circumstances or other justification for the new Green Belt boundaries. West Horsley’s defined current defined Settlement Area boundaries do not need to be extended. West Horsley is a rural village at the foot of the North Downs, partly in the Surrey Hills AONB, extending the settlement area will turn it into a quite different and more urban place that will detract from the green belt and interfere with views from such places as Sheepleas – with an outlook over an urban area.

Adding to the current settlement in this piecemeal way will just add strain to an already stretched infrastructure – roads, shops, schools and the medical centre. This issue not addressed in the local plan and no evidence is given as to how this change would be sustainable.

The development proposals would also be at a higher densities than the village currently is. This would make the village unbalanced and a totally different place. There is no evidence of the need for 385 new homes in West Horsley. Local surveys show that there is the need for a small number of affordable homes for local people not large estates. The proportion of dwellings proposed for the green belt areas is disproportionate to those proposed for brownfield sites in Guildford itself which are much more sustainable being served by Public Transport, employment and other facilities. Brownfield sites should be developed first before there is an consideration of building on the green belt.

If all developments outlined in the plan were to go ahead Guildford would be left sitting in an urban area surrounded by suburbs rather than at the moment surrounded by a rural hinterland with villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3346  Respondent: 15594785 / Karen Sparks  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 Horsleys

The case for removing the Horsleys from the green belt has not been made, nor the extension of the boundaries.

The roads are not suitable for the increase in capacity of traffic arising from the planned volume north/west of the railway.

The road network of the village has very narrow roads that are not suitable for the increase in business traffic – including buses.

The proposed increase from all the individual sites will increase the requirement for schools and health services – I don’t see that these have been addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Wisley Airfield

The road system is not adequate for the volume of housing and the transport access plans have significant road safety issues. There is mention of the M25/A3 interchange but no specifics about how the Old Lane access can be made safe. The site should not be developed at all until after a suitable road system is fully committed to, planned in detail and is in place.

The flood risk paper makes no mention of the risk for the density planned for this site. I can’t see anything that addresses the change to risk with such a large development.

The nearest stations do not have sufficient car parking capacity for the size of the development – the residents are unlikely to travel by bus.

I cannot see that the increase in health services requirements have been addressed.

The road network south to the Horsleys and towards A246 and to Effingham has narrow roads, very narrow in places, that are not suitable for the increase that would arise in business traffic – including the proposed increase in buses.

The plan has a statement which would allow the council to not build a school that is currently stated as part of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/3372  **Respondent:** 15594817 / Toni Thompson  **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:** PSLPA16/3350  **Respondent:** 15594817 / Toni Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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:** PSLPA16/3373  **Respondent:** 15594817 / Toni Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan’s proposed growth is based on the SHMA report. 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?

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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 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:

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?

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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 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: PSLPS16/6561  Respondent: 15594817 / Toni Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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 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: PSLPP16/13728  Respondent: 15594817 / Toni Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which 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: PSLPP16/13725  Respondent: 15594817 / Toni Thompson  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): ()
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:** PSLPP16/13726  **Respondent:** 15594817 / Toni Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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:** PSLPP16/13727  **Respondent:** 15594817 / Toni Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E5 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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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:**

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Do you consider this section of 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:**

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Do you consider this section of 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:

Comment ID: PSLPP16/13656  Respondent: 15594817 / Toni Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 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: PSLPP16/13723  Respondent: 15594817 / Toni Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 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 boundary 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. 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): ()

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 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 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?

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Do you consider this section of the document; complies with 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?
Comment ID: PSLPP16/13722  Respondent: 15594817 / Toni Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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:

Comment ID: PSLPA16/3349  Respondent: 15594849 / Andrew Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3348  Respondent: 15594849 / Andrew Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clock barn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6525  Respondent: 15594849 / Andrew Thomas  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 fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6526  Respondent: 15594849 / Andrew Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.
- I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6524  Respondent: 15594849 / Andrew Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13658  Respondent: 15594849 / Andrew 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 all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13664  Respondent: 15594849 / Andrew 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): ()

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1611  Respondent: 15594849 / Andrew Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3353  Respondent: 15594945 / Sally Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3352  Respondent: 15594945 / Sally Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3354  Respondent: 15594945 / Sally Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6530  Respondent: 15594945 / Sally Thomas  Agent:
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<td>I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.</td>
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<td>I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.</td>
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<td>I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.</td>
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<th>Respondent: 15594945 / Sally Thomas</th>
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<td>· The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.”¹ Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.</td>
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<th>Respondent: 15595041 / Richard Wilkinson</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Impact on local schooling

Given that the site is inappropriate for the location of schools (see above), children living at the new site would have to use existing schools in the area. However the existing schools are already full.

I therefore object to the development on the grounds of its severe impact on local schools.

Incompatibility of the proposed development of Wisley Airfield with the character of the surrounding area

I understand that it is part of planning policy that new developments should be in keeping with the local character, context and distinctiveness.

However the proposed development will create a new settlement that will be larger than any other settlement in Guildford Borough, outside of Guildford itself, in an area that is characterised by small developments in a country / rural setting.

Furthermore the density of around 49 dwellings per hectare of the proposed development compares to an overall density of around 8 dwellings per hectare in East Horsley. Clearly the density of the proposed development is out of keeping with that of the surrounding area.

Also, the development includes the building of five-storey apartment blocks. As there are no such buildings in the area, this is obviously out of keeping with the local area.

I therefore object to the development on the grounds that it is entirely out of character with the surrounding 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>
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Impact of the development at Wisley Airfield on local traffic and infrastructure

The villages of East Horsley, Cobham and Ripley, along with the roads around Effingham Junction station, already suffer from traffic suggestion at peak hours. The development will only increase traffic volumes in all these areas.

Furthermore, neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. As the roads between the proposed development and the stations are not suitable for cycling and there is no bus service, residents at the new development will have to drive to, and park at, both stations. The proposed development will therefore only exacerbate parking at both stations.

Also many of the roads in the surrounding area are country lanes, which are not suitable for the major increase in traffic that would result from the proposed development.

I therefore object to the development on the grounds of its severe impact on local traffic and infrastructure.

Impact on health and safety of the development at Wisley Airfield
The site is located close to the junction of the M25 and A3, where recorded Nitrous Oxide emissions are very high. This will therefore have a detrimental effect on the health of residents in the proposed site.

Furthermore, the proposal includes the building of a new primary and a new secondary school. This is in contravention to government policy which prohibits the building of schools in areas where there are high Nitrous Oxide levels.

I therefore object to the development on the grounds of its unsuitability on health and safety grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13674  Respondent: 15595041 / Richard Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Breach of Metropolitan Green Belt rules

I understand that development on Green Belt land is only permitted under “very special circumstances”. Also, I understand that unfulfilled housing does not constitute very special circumstances.

Furthermore, the reason that land is designated as Green Belt land is for the benefit of the health and well-being of all communities in the area. This includes communities in larger metropolitan areas, such as Guildford. I have seen nothing in the plans to say that the Green Belt no longer provides these benefits to local communities.

I therefore object to the removal of land from the Green Belt on the grounds that:

1. a) it is a breach of Metropolitan Green Belt rules, and

b) it will have a detrimental impact on the health and well-being of all communities in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6535  Respondent: 15595105 / James Beauchamp  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 a ridiculous idea. Tannery lane is a narrow and bendy road joining Send Road at a very difficult and potentially dangerous junction. The traffic in Send is already heavily congested and further traffic emerging from Tannery Lane will only make this worse. Traffic improvements at the junction will not help, as the congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. The future traffic has already been exacerbated by planning permission for 64 apartments and a marina further down Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6536  Respondent: 15595105 / James Beauchamp  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 7000m2 of industrial space at Garlick’s Arch. Ancient woodland! Subject to flooding! Plenty of brownfield sites already available in the borough! Slyfield is already the industrial centre of Guildford Borough so why create another one especially as there is an over supply of industrial space in the area at the moment and for the foreseeable future. In addition, Guildford’s housing plan requirements have been shown to be grossly exaggerated and when challenged, the council refuses to release their calculations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6538  Respondent: 15595105 / James Beauchamp  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. I have already described how Send Road is heavily congested especially at peak times. By creating a new interchange at Burnt Common this will choke Send Road and the Village with additional traffic to and from Woking. Not only will this become the new rat run into Woking from the A3 and the M25 but will also have to contend with additional traffic from the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and 1850 houses at Blackwell farm. This on a road that is already heavily congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the development of 40 houses and 2 travellers’ pitches at Send Hill. Another ridiculous idea. As with the Clockbarn proposal, the effect of the additional traffic on the already congested Send Road will be significant and unacceptable. Send Hill is also a narrow residential lane and will be badly affected by the additional traffic. [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:

I object to Send being removed from the Green Belt. The Green Belt was established as a permanent feature required by the National Planning Policy Framework and not something that can be taken away under pressure from property developers, unjustified government targets or a Borough Council who prefers to develop in the areas that they believe will give them the least resistance.

There are no special circumstances to justify Send losing its Green Belt status and as a buffer to separate Guildford from Woking it is essential that its Green Belt status be retained.

Local councillors and central government gave a clear election promise to protect the Green Belt. The current proposals renege on those promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Send I am appalled at the proposals put forward in the Local Plan. The plan is supposed to be the result of the consultation process between the Borough Council and its residents. We have already put forward our views during the process and have been totally ignored. It is not surprising that the people of this country have lost faith in our politicians (you guys).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3361</th>
<th>Respondent: 15595137 / Sheila Keogh</th>
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• We 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

- We 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.

- 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.

We reflect objections from our family and friends who regularly visit us and benefit from the current surroundings and are acutely concerned about the changes proposed.

We 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.

- We 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.

  - We object to the detrimental impact on transport, local roads and road safety. We 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
  - We 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).
  - We 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.
  - We 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.

- We 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13678  Respondent: 15595137 / Sheila Keogh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 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: PSLPP16/13680  Respondent: 15595137 / Sheila Keogh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of 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 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).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8299  Respondent: 15595169 / Christina Barbara O'Shaughnessy  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 believe the Council's proposals to be deeply flawed and seriously detrimental to Guildford and the surrounding areas, particularly Burpham and Merrow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15267  Respondent: 15595169 / Christina Barbara O'Shaughnessy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the 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 the Council's proposals to be deeply flawed and seriously detrimental to Guildford and the surrounding areas, particularly Burpham and Merrow.

To introduce such a disproportionate volume of new housing without first tackling the already severe traffic problems in the area is totally irresponsible and seriously questionable. This is putting the horse before the cart and puts the local area under such intense pressure such that will adversely affect all residents, old and new.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3362  Respondent: 15595201 / Carole Manning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have been a resident of West Horsley since 1976. We selected this area for its quiet, rural charm and the last 40 years have not disappointed.

The proposal to take East and West Horsley out of the Green Belt is unacceptable when there are other more suitable and less damaging options; there are brownfield sites in the area and only when all such sites are developed should more sensitive areas be carefully considered. In my view, the development of Wisley Airfield is an obvious unused brownfield site with space, and excellent access, for the creation of a new development with all the infrastructure needed to take the pressure off local schools, doctors' surgeries and shops. A large development on this site could provide housing needs for 10-15 years.

I feel that the first line of Policy P2 – “we will continue to protect the Metropolitan Green Belt against inappropriate development” should not be treated as a casual remark and should be guarded very responsibly by those who live in and care for this rural and special area. Short sighted and short term solutions to cater for housing needs must not be allowed to damage protect countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3366  **Respondent:** 15595297 / Caroline Davison  **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 Send Village being removed from the Green Belt, I can see no reason whatsoever for this being necessary for the local community. The Green Belt / flood plain prevents Send from being swallowed up by Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6550  **Respondent:** 15595297 / Caroline Davison  **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 further object to 45 houses being built at Clockbarn Nursery, the roads in the area are totally unsuitable and would result in added congestion and increased risk of accidents at the junction of Send Road and Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6551  Respondent: 15595297 / Caroline Davison  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 most strongly to the proposed huge development of houses and industrial space at Garlick's Arch. This area is covered by ancient woodland and should remain so for our native wildlife. There is more than enough brownfield sites in and around Guildford that should be redeveloped before ANY Green Belt land should even be considered for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6553  Respondent: 15595297 / Caroline Davison  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): ()

And lastly a most strongly object to a new interchange with the A3 at Burnt Common being built. The roads from Send, Ripley and Clandon are frequently gridlocked during rush hours as it is now and a new interchange would without a doubt make traffic on these road a thousand times worse. Please do not allow this to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6552  Respondent: 15595297 / Caroline Davison  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. This land is totally unsuitable for building on, being an old landfill site and a single track road. Build in the towns please!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6555  Respondent: 15595329 / Lindsay Franks  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. I object to the amount of houses which I being proposed to the area - there is no infrastructure in place to deal with the amount of new road traffic which this will produce.
2. I object to the building of a new secondary school - there are many spaces available to local existing secondary schools and as I currently work at the local primary school which is full at present and would be unable to cope with an additional 1000 homes - where would these children go to primary school? why are we concerned with secondary school when they will need to be in education before then and nothing is in place for that.
3. I object to the amount of traffic this will increase our roads by. At the moment there are a few dangerous roads as it is when pulling out of Beech Lane and this is only going to make things worst and with doubt an accident will happen.
4. I object to the amount of land which is going to be lost - this is a greenbelt area and it will be lost purely for the construction of a concrete area. We are constantly being reminded that we need to encourage our children to be outside and enjoying the fresh air and green space but this is trying to be taken away from us which is tragic.
5. I object to the amount of homes which are being proposed. I understand that new homes are needed but how many of these will actually go to Normandy residents. This has been proved with the development on Beech lane where the house were only suppose to go to normandy residents but that is not the case and many of them are now being lived in by people who have no connection to the village at all.
6. I object as this is my village and needs to remain as a village. Adding 1000+ homes with still no shops, hardly any local transport this is an incredible oversight from both the planners and Guildford Borough Council too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3381  Respondent: 15595425 / Colin Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I write to object to the local plan proposals to build many more houses within the Horsley settlements. I believe that these massive additional numbers are unnecessary and would impose an unsupportable load on the local infrastructure, transport and medical services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6563  Respondent: 15595457 / Mark Shoebridge  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 strongly object to the above proposed development. Having just returned from a morning of cycling and walking in this beautiful green belt area, this is a much needed green belt space and must remain so to protect the local wildlife and countryside as it is.

The development plans look way too heavy for the local area.

The roads and surrounding small villages will be swamped by the traffic from the service vehicles needed for building the development and then congestion from the additional residents from the development.

Traffic at the M25 and A3 junction is already at bursting point at peak times.

I believe there is supposed to be a plan for the residents to cycle but where are the plans for this.

No exceptional circumstances have been identified to allow this development on green belt land

There will also be a huge demand on local amenities, schools (already over subscribed), doctors, dentists, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13772  Respondent: 15595489 / Michael Crates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

I believe there is supposed to be a plan for the residents to cycle but where are the plans for this.

No exceptional circumstances have been identified to allow this development on green belt land

There will also be a huge demand on local amenities, schools (already over subscribed), doctors, dentists, etc.
Do you consider this section of 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 Insufficient affordable housing

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): ()

1. I object to the Lack of proper infrastructure planning/capacity for sites
2. I object to the additional demands made on already overstretched Local healthcare facilities
3. I object to the increased demands on schools places
4. I object to not being able to exercise my right of choice for schools as areas are squeezed
5. I object to the additional demands made on Local policing facilities
6. I object to the Parking issues in local villages caused by larger population

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13765</th>
<th>Respondent: 15595489 / Michael Crates</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. I object to any further air and noise pollution caused by increased traffic
5. I object to the increased risk of accidents and deaths involving cyclists caused by increased traffic

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): ()

17. I object to Lack of proper cycle lanes on local roads
18. I object to lack of proper pedestrian footpaths on local roads

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I object to all erosion of the green belt
2. I object to any "in-setting" of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPP16/13766</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object to any further degradation of roads caused 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: PSLPP16/13771</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): ()

6. I object to the congestion caused on the A3 and M25 trunk road

7. I object to the increased congestion on the local village roads and lanes

8. I Object to the Unsuitability of our local roads for heavy vehicles and more traffic

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): ()

15. I object to Sites being planned in unsustainable locations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am a resident of Merrow Park – and object to the proposed development at Gosden Hill Farm for the following reasons:

The development of thousands of 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 Burpham, Merrow, 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.

Gosden Hill Farm (A25) is in an unsustainable location. This site does not benefit from a railway station 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. This site is also unsuitable due to being unable to access sustainable transport. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I also 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.

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.

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 such as that identified at 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.

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.
This development 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 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 the surrounding villages. It would have four times the amount of housing as West Clandon plus shops, offices/factories, GP surgery, schools. Development on this scale would blight this 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: PSLPA16/3386   Respondent: 15595553 / Carol Davis   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 SHMA figure. Appendix d: evidence base

The SHMA proposed housing numbers of 693 houses per annum is very high and bears no resemblance to the national estimates for housing growth. There is no explanation of these numbers and they seem very doubtful and appear to be grossly overestimated. The number is more than double the figure of 322 which has been used previously and as the source is confidential there is no tracking and this should not be used in consultation, it is undemocratic.

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6572  Respondent: 15595553 / Carol Davis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the continued inclusion of the site A35 Formerly Wisley Airfield (Three Farm Meadows), Ockham in the Local Plan. A35

This planning application was recently unanimously rejected by GBC's planning committee on the recommendation of the GBC planning officers who had grave concerns about the application.

I objected to this application on a number of grounds including the quality of the agricultural land, the impact on wildlife and the complete lack of infrastructure to support such an application. The road system is already at a standstill and even with the proposed new junction on the A3 (which has so obviously been added to the plan at the very last minute as a means to support this enormous housing development and the proposed development at Gosden Hill A25) the impact on the local villages and environment would be enormous. Flooding in that area remains a huge problem and cannot be ignored.

Serious concerns about this site were also raised by the Environment Agency, Thames Water and Highways England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6573  Respondent: 15595553 / Carol Davis  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? ( )
1. I object to the inclusion of Clockbarn Nurseries A42 in the Local Plan

Clockbarn Nursery is located on Tannery Lane which is a narrow road with no pedestrian footways after a few hundred yards down from Send Road. Planning permission is already in place for new housing and as a result the road would not be able to cope with any additional traffic. Tannery Lane exits onto Send Road at an extremely busy junction with poor visibility for emerging traffic. The land at Clockbarn Nursery is agricultural with an abundance of wildlife and should not be developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6574  Respondent: 15595553 / Carol Davis  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 installation of ramps to use the northbound A3 would create a large amount of additional traffic to the local roads that are already overburdened, especially at rush hour times. The A247 through Send is already an extremely busy road and would become gridlocked with the additional 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: PSLPP16/13783  Respondent: 15595553 / Carol Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the proposed high density housing in the Horsleys

The proposed increase of up to 35% of new homes compared to existing homes in West Horsley is greater than any other single area in the Borough. The proposals for West Horsley are unbalanced and unsustainable and would change the character of the village forever.

The NPFF requires that residential development must respect the character and density of the housing in the area and be limited in quantity by the availability of infrastructure and local facilities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13784  Respondent: 15595553 / Carol Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The addition of 385 homes on sites A37, A38, A39, A40 and A 41 in the timeframe of 2018-2022 would be an unbearable strain on the local infrastructure.

The Plan does not address the provision or even consider the need for expanding local services. The Raleigh Junior School is full with no room for expansion and the Howard of Effingham Secondary School is also operating at full capacity. The drainage systems would not be able to cope and would have to be completely upgraded. The infrastructure including the roads, public transport and medical provision are totally inadequate for this housing proposal and would not be able to support this level of development. The impact on the residents of these villages must be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13785  Respondent: 15595553 / Carol Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy 11)

There are insufficient infrastructure details in the plan to support the enormous development that is planned. Many sites, including Garlick’s Arch (A43), do not have any infrastructure improvements identified. Policy 11 requires the delivery of improvements to infrastructure in conjunction with development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13786   Respondent: 15595553 / Carol Davis   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 trunk roads and village roads (Policy I2)

There would need to be significant improvements made to the major trunk roads, A3 and M25, prior to any development taking place. It is noted that Highways England has no plans to start improvements on the A3 before 2020. Therefore it would be unsustainable for the huge developments at the Former Wisley Airfield A35, Garlick's Arch A43 and Gosden Hill A25 and the large developments in the Horsleys to take place within the time frame of the Plan.

The villages are already struggling with traffic volume and there is no strategy for improving capacity in the Plan. The road surfaces are in a bad condition, parking is an issue in many of the villages and provision for pedestrians is often poor. Added to this is the increased popularity of cycling which would create more danger for participants with increased traffic.

I wish my objections to be fully taken into consideration and that the Local Plan is amended in accordance with the objections raised

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13781   Respondent: 15595553 / Carol Davis   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the proposed removal of the Horsleys, Send and Ripley from the Green Belt.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. The villages of East and West Horsley, Send and Ripley and sites at the Former Wisley Airfield (Three Farm Meadows) A35, Garlick's Arch A43 and Clockbarn Nurseries A42 should not be removed from the Green Belt (Policy P2).

The Green Belt provides a buffer from urban sprawl and must not be permanently eroded.

The National Planning Policy Framework, para 87 states that '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'

The proposal that 8,202 (64.6%) of all proposed new homes are to be built in the Green Belt is totally unacceptable. The areas around the villages of the Horsleys, Clandon, Send and Ripley would account for 50% of the new homes.

West Horsley is proposed to have 35% of its existing number of homes - the largest of any of the proposed developments and this is unsustainable.

The character of the villages would be lost forever and the countryside removed for future generations.

The site at Garlick's Arch was added very late to the Plan without prior consultation and with no infrastructure planning. The road network, medical facilities, schools provision and basic utilities would be unable to cope. The proposed 400 houses are not needed in the village or borough and the local area could not support a development of this site. It is totally inappropriate.

GBC's Green Belt and Countryside Report does not address Garlick's Arch so there is NO evidence base to support including this site.

The proposed industrial development of 7,000 sq m is not required as stated by the ELNA report showing an 80% reduction in employment floor space required since the previous plan. There is a brownfield site available at Burnt Common which has been taken out of the plan and also the industrial site at Slyfield where further development could take place on the 40 ha available site. This site has been included as a payback for the land for the proposed A3 interchange.

There is no sustainable transport from this site and it has been identified as having a high risk of flooding by the Environment agency, which is higher than GBC's assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

The site is bordered by Ancient Woodland which must not be removed and is home to a huge amount of wildlife, including protected species. There has been no wildlife report conducted on the site (Policy 14)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan Policy S1

The Local Plan proposed is not sustainable. The National Planning Policy states that the planning system should contribute to the achievement of sustainable development. The proposed development of 13,860 houses during the period of the plan is just not sustainable. The impact on the local communities, namely the villages north of Guildford, would be disastrous as they would not be able to cope with the proposed level of development. The needs of these local communities have been completely ignored in this Plan.

Site A35 at Wisley Airfield and site A43 Garlick's Arch are positioned in locations with no public transport - already overcrowded railways are a drive away and bus services are very limited. Therefore these sites would be unable to access sustainable transport and would rely totally on the use of cars. There is already major congestion in these areas and concern over air pollution and this would be exacerbated. Development should take place in urban areas where sustainable transport options can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13780  Respondent: 15595553 / Carol Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

The strategy proposes that 13,860 houses are developed across the borough but does not apply any constraints to reduce the overall housing figure. This is different to all other Borough Councils in Surrey.

The strategy in the plan suggests a disproportionate amount of development in the north east of the borough with the inclusion of the Former Wisley Airfield A35, Garlick's Arch A43 and Gosden Hill A25 as three huge residential sites. These sites are in Wards that currently represent 11% of the housing in the borough, due to their rural nature, but these Wards would have to bear 36% of all the new housing. The rural nature of these areas would be lost with the urbanisation and this would permanently destroy the communities. This is a very unbalanced plan which does not reflect the current housing spread in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13782  Respondent: 15595553 / Carol Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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 identified brownfield sites in the Plan

GBC have failed to identify enough brownfield sites for development with the urban area. These should be used for development before the destruction of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/226  Respondent: 15595553 / Carol Davis  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): ( )

As a resident of West Horsley who works in Send I am writing to object again to the Guildford Local Plan.

As one of the 30,000+ local residents who objected to the Local Plan in 2016 I note that there is very little evidence of change with regard to expansion into the Green Belt. I also note that some areas have had large plans withdrawn completely (Normandy and Flexford) whereas other areas, mostly to the east of Guildford, have more than their fair share of proposed development in the Green Belt.

I object to the fact that there has been NO change to the insetting of West and East Horsley from the Green Belt.

I question the housing numbers put forward by Guildford estimating that the town will grow by 25% by 2034. This is nearly double the predicted growth for Guildford from the Office for National Statistics. Guildford MUST constrain its housing growth and do more to protect the Green Belt. There needs to be more housing in the town centre and on brownfield sites.

I object that there have been NO changes to improve the sustainability of the West Horsley development sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/227  Respondent: 15595553 / Carol Davis  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 as this location is next to the River Wey navigation next to beautiful countryside. As mentioned above the road, Tannery Lane, is totally unsuitable for additional traffic and is a narrow country lane. This is a totally unsuitable area for further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2109  Respondent: 15595553 / Carol Davis  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 as the addition of more houses (33%) will cause more traffic and access problems in the narrow Tannery Lane. The junction with Send Road is already very dangerous and the proposed additional traffic will only make this worse. It will ruin the countryside view in this area near the River Wey and further erode the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2110  Respondent: 15595553 / Carol Davis  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 as this is Green Belt land with areas of ancient woodland that should not be designated for Travelling Showpeople. There are no exceptional circumstances for building on this land. I note that an application in Vicarage Lane for one house was recently turned down as it is in the Green Belt and yet this is proposing over 400 houses and sites for travellers on Green Belt land incorporating ancient woodland. This does not make sense. Other factors that must be considered include:-
• the local area will not be able to cope with the additional traffic generated and will cause hold ups on all the local roads
• the proposed number of houses is far too high for the area
• the allocation of a site of ancient woodland for the travellers is wrong and would not suit their needs
• the combination of general housing and travelling show people is not satisfactory
• the proposed number of pitches represents the total number required for the whole borough on one site
• the huge number of objections made about this proposal to build on the Green Belt and destroy ancient woodland MUST be considered

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2111  Respondent: 15595553 / Carol Davis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because there is a reduction in the demand for industrial land over the borough - this is shown by the 2017 Employment Land Need Assessment and was noted in a recent application in Tithebarn Lane as the reason for conversion of industrial land to housing. It cannot work both ways.

• There are still empty sites at Slyfield and therefore there is no need to build more industrial development on the Green Belt
• The local area would not be able to cope with additional traffic potentially generated.
• This site was previously deleted from the 2014 draft due to objections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6576  Respondent: 15595585 / Tim Wiggins  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 Infrastructure Plan as it takes no account of the proposed development in Garlick's Arch - proper consultation and inclusion of this development has obviously not happened, so the plan is flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I further object to the development at Garlick's Arch due to the inadequate assessment of flooding risk - as evidenced by the Environment Agencies assessment being higher than GBC's. Every winter the drainage from Burnt Common Lane onto Portsmouth road floods, despite previous attempts to improve the situation. Our house has also been flooded previously, causing pain and increased insurance premiums, so the low risk assessment has obviously not included previous incidents in the area.</td>
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<td>Adding more houses at Garlick's Arch will already add to the traffic congestion in the area, as will additional entry / exit ramps at Burnt Common - the A3 is already heavily delayed each rush hour at the M25 junction and through Guildford itself. Additional entry / exit ramps at Burnt Common will push traffic through Clandon and Send which are relatively small roads and are already busy.</td>
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I do not believe that we can add thousands more homes into the Borough as the infrastructure will not support this. Last year my eldest daughter was going to Secondary School and due to the lack of places was first allocated a school in Addlestone which was impossible to get to. Additionally, in the 15 years that I've lived in the Borough I have sometimes worked in London and had to commute by train, either from Clandon or Woking - Woking is already impossible to get a seat on the train, and the Clandon trains are almost at capacity now (at Clandon, which is only 2 stops along the slow line to London), despite additional carriages, whereas there used to be spaces on the trains.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to any use of green belt land for development as there are no special circumstances provided for using this land, as required by the National Planning Policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Borough Wide Strategy as 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 the villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1616  Respondent: 15595585 / Tim Wiggins  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 finally object to the multiple revisions of the plan with relatively short notice - only last year a plan was included for commercial development on brownfield sites at Burnt Common - these are now removed. Additionally, the proposed development for 40 houses on Burnt Common Lane was added at the last minute to last year's plan - but subsequently removed. The plan should follow GBC’s consultation process without having last minute amendments which cause all concerned a great deal of disturbance.

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: PSLPA16/3387  Respondent: 15595617 / Alan George  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): ()
Traffic
- There is no clear plan in place to deal with the significant increase in traffic. Plans are merely aspirational.
- Evidence on future traffic levels has not been demonstrated in the Strategic Highway Assessment Report (SHAR).
- The Gosden Hill Development will put enormous pressure on the A3 (North and Southbound) and the London Road/New Inn Lane intersection which at present are significant bottlenecks.
- Should a tunnel be part of the proposal to ease traffic congestion, this will need to be agreed prior to any development commencing to avoid sterilisation of land needed for construction of the tunnel.

Size of Development
- The 14000 homes proposed in the plan on sites close to and in Guildford will be unsustainable in the absence of a clear agreed plan for new schools, transport (rail and road), medical facilities, sewerage, retail facilities and the creation of new jobs.
- In any event the figure is far too high compared with the present population of Guildford. The construction of 14000 new dwellings is likely to increase the population of Guildford (current population approximately 140,000) well in excess of 25%.
- The unique identities of the villages which are close to the proposed developments will be changed for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6584  Respondent: 15595649 / Margaret Hunt  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 A26

Sir, I wish to object to the local plan on the grounds that it is unsound, for the following reasons.

1. In the development at Gosden Hill, it appears that the building of the houses etc. will begin before the new roads are put in. This will lead to increased traffic through Burpham, already snarled up at peak times.

2. The plan for the park and ride seem a good idea, BUT, while the traffic from the north will enter easily, when the customers return they will have to come through Burpham to access the Clay lane slip road, again causing holdups and increased pollution from idling cars. An access road from the park and ride, and the new houses, to the north bound carriageway would seem a sensible idea, channelling the traffic away from Burpham bottleneck.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13796  Respondent: 15595649 / Margaret Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of 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

3, The Green Belt was brought in to prevent ribbon development along major highways causing urban sprawl. The building on Gosden Hill, Garlik Arch and Wisley aerodrome looks very much like ribbon development, connecting up the villages along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3388  Respondent: 15595681 / Willemien Downes  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:

Comment ID: PSLPA16/3389  Respondent: 15595681 / Willemien Downes  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:

Comment ID: PSLPS16/6586  Respondent: 15595681 / Willemien Downes  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:**

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Do you consider this section of 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 addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with 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?

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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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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: PSLPP16/13800  Respondent: 15595681 / Willemien Downes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 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: PSLPP16/13813  Respondent: 15595681 / Willemien Downes  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).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13812  Respondent: 15595681 / Willemien Downes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13803  Respondent: 15595681 / Willemien Downes  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): ()
includes over 80 ancient oak trees.

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp; M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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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: PSLPP16/13797  Respondent: 15595681 / Willemien Downes  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): ()

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: PSLPP16/13793  Respondent: 15595681 / Willemien Downes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
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): ()

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the
borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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): ()

This plan is too many houses too close together relying on the existing infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3390  Respondent: 15596065 / Maryjane French  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): ()

Where are the calculations for the required number of houses coming from. There is no evidence and the latest I heard was that the number could be reduced due to Brexit plans!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13815  Respondent: 15596065 / Maryjane French  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): ()

We need affordable houses NOT luxury 5 bedroom houses that draw more people out of London! We need them built on brownfield sites. This should be at the heart of the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13814  Respondent: 15596065 / Maryjane French  Agent:
You are re-designating Green Belt land and this should be discussed and carefully thought out not just changed without consultation. The Green Belt was given a special status for a reason.

Keep our Green Belt and Villages safe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6588  Respondent: 15596097 / Kelvin Ager  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): ()

OBJECTION TO NORMANDY AND FLEXFORD LOCAL PLAN

I write to strongly object to the Green Belt land taken out of Green Belt and this virgin land full of old English trees, wildlife and beautiful pasture used to build houses and schools with commercial retail shops. This type of development which in fact would double the size of the village would not enhance village life it would make it into a town.

Can the planning committee demonstrate the need in this particular corner of Surrey for such a development?

Has the transport infrastructure been adequately addressed? The number of vehicles which would be in the area on the local Lanes would make it impossible to travel even a small distance without having huge queues. The traffic backs up daily on the A323 which is also a relief road for the Hogs Back. Ash has a railway crossing which causes traffic build up. Normandy is bound by two railway arches one which is a small bridge only allowing very slow passing vehicles and is bound by houses on all sides. The other railway bridge restricts the height and flow of one car per time in either direction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3393  Respondent: 15596129 / Kim Beauchamp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
I object to Send being removed from the Green Belt. The Green Belt was established as a permanent feature required by the National Planning Policy Framework and not something that can be taken away under pressure from property developers, unjustified government targets or a Borough Council who prefers to develop in the areas that they believe will give them the least resistance.

There are no special circumstances to justify Send losing its Green Belt status and as a buffer to separate Guildford from Woking it is essential that its Green Belt status be retained.

Local councillors and central government gave a clear election promise to protect the Green Belt. The current proposals renge on those promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery. This is a ridiculous idea. Tannery lane is a narrow and bendy road joining Send Road at a very difficult and potentially dangerous junction. The traffic in Send is already heavily congested and further traffic emerging from Tannery Lane will only make this worse. Traffic improvements at the junction will not help, as the congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. The future traffic has already been exacerbated by planning permission for 64 apartments and a marina further down Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to building 400 houses and 7000m2 of industrial space at Garlick’s Arch. Ancient woodland! Subject to flooding! Plenty of brownfield sites already available in the borough! Slyfield is already the industrial centre of Guildford Borough so why create another one especially as there is an over supply of industrial space in the area at the moment and for the foreseeable future. In addition, Guildford’s housing plan requirements have been shown to be grossly exaggerated and when challenged, the council refuses to release their calculations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6593  Respondent: 15596129 / Kim Beauchamp  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. I have already described how Send Road is heavily congested especially at peak times. By creating a new interchange at Burnt Common this will choke Send Road and the Village with additional traffic to and from Woking. Not only will this become the new rat run into Woking from the A3 and the M25 but will also have to contend with additional traffic from the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and 1850 houses at Blackwell farm. This on a road that is already heavily congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6592  Respondent: 15596129 / Kim Beauchamp  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. Another ridiculous idea. As with the Clockbarn proposal, the affect of the additional traffic on the already congested Send Road will be significant and unacceptable. Send Hill is also a narrow residential lane and will be badly affected by the additional traffic. I do not accept the proposal that there are to be two travellers' pitches in Send. [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 following the recent closure of Ripley police station and the loss of our local police presence (policemen on the beat) there will be no deterrent at all in our village.

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Do you consider this section of the document; 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 removing the Green Belt from Chilworth. Its our safeguard to being overwhelmed by various building developments. When we are essentially a village in beautiful countryside all round us.

**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): ()

**Objection to Guildford Borough Council's 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) It is in all our interests to protect Green Belt sites from development. This was promised in the Election manifesto.

2) The proposed site, Former Wisley Airfield (FWA/TFM) is on Green Belt land. For this reason I object most strenuously to 70% of this Green Belt land to be taken and used to build 2100 new dwellings.

There is ample brownfield land in urban areas which needs to be regenerated instead.
3) The FWA/TFM 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). This is 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:

   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

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:

   • Access to the countryside and clean air
   • 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 FWA/TFM where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), the planning application of Wisley Property Investments Ltd (WPIL) 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:** PSLPA16/3394  **Respondent:** 15596225 / Thomas Patrick O'Shaughnessy  **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 consider the Council's proposals to be seriously detrimental to Guildford and the surrounding areas, particularly Burpham, Merrow, Send and Ripley, and believe the research and presentation of data to be deeply flawed and inaccurate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/13818  **Respondent:** 15596225 / Thomas Patrick O'Shaughnessy  **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 introduction of such a disproportionate volume of new housing without first tackling the already severe traffic problems in the area is totally irresponsible and seriously questionable. Building housing and commercial developments which will inordinately increase the amount of traffic both residing within the area and travelling to Guildford from outside, will create a pressure cooker situation of constantly grid locked roads. The road system is currently under significant pressure and the problems of traffic management must be addressed before any new building in the area can be considered feasible.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<td>The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. The Plan takes no account of the infrastructure required for Garlick's Arch.</td>
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<td>I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) We already experience massive congestion in the villages and this plan will cause even more traffic congestion in Ripley, Send and Clandon, with no plan to improve that.</td>
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<td>The rural roads in this area are narrow, in poor condition and have no footpaths. An additional 5,000 more houses would create dangerous and unsustainable traffic. There would need to be a clear plan in place to ensure congestion is not further increased in these villages.</td>
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<th>Respondent: 15596289 / Catherine Bremford</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The A3 or M25 would have to be improved before any development is done. Developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place until a realistic plan is in place.</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 removing Ripley, Send and Clandon from the Green Belt. I don't believe there are exceptional circumstances for these villages and sites being removed, as required by the National Planning 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>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I strongly object to the development plans at Blackwell Farm. This land should not be used for house building.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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Comment ID: PSLPP16/13837  Respondent: 15596417 / Jake McQuade  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): ()

The proposed plan would impact me as I am 18 and will be looking into summer jobs in the area as a way to earn money when I am back from university, with more potential residents entering the area it will make job opportunities harder to find for me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13838  Respondent: 15596417 / Jake 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): ()

Another issue is that the local area would not be able to cope with the increase in traffic as there will be a huge rise in the amount of cars on the road meaning more pollution to the area and making the roads more dangerous. Also the noise levels will increase in a peaceful area where everyone gets on and lives without any conflict but by having more people in the area there is more of a chance that this will change. I don't think that the station or the local parade of shops will be able to cope with the high demands that will be brought upon by having such a huge increase of population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3401  Respondent: 15596513 / Christine Matthews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Appendix D

2. I object to the lack of evidence and justification for the housing need numbers. These cannot be based on any sensible analysis of local demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6605  Respondent: 15596513 / Christine Matthews  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): ()

POLICY A44

On Policy A44. 1.9a Land West of Winds Ridge and Send Hill 1. I object to the proposal on the grounds that Send Hill is in part a single track country road and too narrow, particularly at the Potters Lane Junction, to accommodate the extra traffic the proposed development would bring.

1. I object to the proposal on the ground that Send is in Green Belt. The proposed inset is inappropriate due to its permanent green belt status.
2. I object to the proposal on the grounds that the existing roads and parking infrastructure is already inadequate and could not cope with the extra traffic.
3. I object to the proposal on the grounds that the proposed development site (A44) was used as a GBC registered landfill site. Disturbance of the site would be a health hazard due to the unknown materials in the site.

5 I object to the inclusion of Traveller Accommodation on Send Hill due to the disturbance of an existing community. If significant development is in prospect the Traveller Accommodation should be planned as an integral part of such new development (as for affordable housing) rather that imposed on the existing community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13841  Respondent: 15596513 / Christine Matthews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY II

1. I object to the scale of the development at Wisley, Garlicks Arch and Merrow because there is no provision for appropriate timely investment in infrastructure (roads, schools, hospitals etc). Anyone living locally would confirm that the road infrastructure is inadequate now, never mind having to cope with the extra volumes resulting from the Proposed Plan.

I object to in particular the scale of development at Grlicks Arch and Merrow which will produce significant extra traffic volumes into and from Woking via Send Road and Potters Lane. Neither of these roads can safely or effectively handle increased traffic flows.

The Objections above demonstrate. Democratic deficit between the views of the local population and the unjustified scale of development in the Proposed Plan which places now value on existing amenity (i.e Green Belt) and contains no practical plans for infrastructure enhancement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I accept the need for additional housing, particularly low-cost housing, for future generations but I do not accept the figure of 693 houses per year and do not understand why there is no background information available to explain how this figure is calculated. I object to this figure being used as the basis for decisions which will alter the local landscape 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: PSLPP16/13842  Respondent: 15596545 / Nye Morgan  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 provision of more affordable housing on Brownfield sites and within town boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13839  Respondent: 15596545 / Nye Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the 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 profound disagreement with aspects of this plan. In particular, I object to all developments in the current Green Belt. It is vital that this land remains undeveloped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13843  Respondent: 15596545 / Nye Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the proposed developments around and between villages in the current Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3402  Respondent: 15596609 / Della Morgan  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 accept the need for additional housing, particularly low-cost housing, for future generations but I do not accept the figure of 693 houses per year and do not understand why there is no background information available to explain how this figure is calculated. I object to this figure being used as the basis for decisions which will alter the local landscape for ever!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13845  Respondent: 15596609 / Della Morgan  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 provision of more affordable housing on Brownfield sites and within town boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/13844  Respondent: 15596609 / Della Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the 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 profound disagreement with aspects of this plan. In particular, I object to all developments in the current Green Belt. It is vital that this land remains undeveloped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13846  Respondent: 15596609 / Della Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the proposed developments around and between villages in the current Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13866  Respondent: 15596833 / Brian Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
You expect us to read through the acres of material on these issues, but nowhere do you give proposals for the Guildford Borough Council will solve the congestions problems at Burnt Common, how the doctor’s surgery will cope and where children will be educated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13865  **Respondent:** 15596833 / Brian Alexander  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We live in the Send/Ripley/Clandon area because it is close to London and other amenities and enjoys good transport links. BUT we live here primarily because it is a green and pleasant land, protected by the Green Belt, designed to ensure that generations of planners do not allow the metropolitan sprawl to continue unabated. Architects and town planners come and go and few are ever held accountable for terrible errors of judgement. On the other hand, residents and their families stay for generations.

To remove this area from the Green Belt would be a travesty. This area would rapidly become just another housing development to join Surbiton and Cobham with Guildford and Woking. The urban sprawl would reach far and wide – and once that decision is made, no architect or planner would be able to stand in its way.

Huge objections were raised two years ago and little victories were achieved. But as with all planning issues, they keep coming back. Here we are in 2016 faced with more house development proposals (on my understanding about 690 homes per year), plus 400 more houses and industrial units at Garlick’s Arch, followed by the relentless pursuit of traveller pitches in Send Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13868  **Respondent:** 15596833 / Brian Alexander  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the 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 and pray that you keep us in the Green Belt. It will be on your collective conscience for ever if you nod it through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I understand the area needs to produce more housing stock, but the amount you are expecting this area to manage is totally disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Although appreciating that more housing is required in the borough, I do not think the Council have listened to its residents since the last draft plan was issued.

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): ()

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. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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:
We strongly object to the proposed development of 40 houses and two pitches for travellers. The single width road is inadequate and such a development would be a visual blight on the much treasured countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6625  Respondent: 15596961 / Peter Meadows  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): ()

We strongly object to there being a new interchange with the A3 at Burnt Common because of the impact on Send to the increased level of traffic from the proposed new housing at Wisley Airfield, Godden Hill, Burpham and Blackwell farm. The noise and pollution that would result from gridlocked traffic would be unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6625  Respondent: 15596961 / Peter Meadows  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): ()

We strongly object to there being a new interchange with the A3 at Burnt Common because of the impact on Send to the increased level of traffic from the proposed new housing at Wisley Airfield, Godden Hill, Burpham and Blackwell farm. The noise and pollution that would result from gridlocked traffic would be unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13869  Respondent: 15596961 / Peter Meadows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of 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 given considerable attention to the proposed Local Plan, being among the newer residents of Ripley who are already experiencing growing problems with traffic congestion here and in the wider area, we are writing to express our views.

Please make sure the following grave concerns are shown to the Planning Inspector.
<table>
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<tr>
<th>Comment ID: PSLPP16/13882</th>
<th>Respondent: 15597985 / Tina Spong</th>
<th>Agent:</th>
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I object to any development on the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13888</th>
<th>Respondent: 15598049 / Hugo Collinson</th>
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I am 16 and have lived in West Horsley all my life. I went to the Raleigh school and live nearby. I like living in the countryside as I enjoy taking my dogs for a walk nearby and seeing the deer, foxes, rabbits and other animals and insects.

I don’t like that the Raleigh is always overcrowded and always has been with classes of at least 30 as the school needs to raise money. This won’t change if it moves it will just become a giant school and the terrible traffic problems and fumes that have been around Northcote Crescent and Nightingale Crescent will be moved into East Lane. Maybe this will make me happier except it will use up a field full of wildlife which is now part of the Green Belt. Please put this where there are old ugly buildings. If there are new houses will I be able to afford one or will I be a chosen first? Is this about money and numbers rather than about people?

There won’t be enough doctors or parking or school places or good enough roads because this is not in the plan. It will mean that people like me will lose out and people like you will be happy. Surely the young should decide their future and the residents rather than parents at the Raleigh who are not resident and probably live in other villages or Guildford as they don’t care about us.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6631  Respondent: 15598113 / David J. Blackbourn  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): ()

Site Allocation Policies: I am in support of the development of Blackwell Farm (Site Allocation A26) being in the Local Plan but believe that it should be extended to provide for 3,000 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13903  Respondent: 15598113 / David J. Blackbourn  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): ()

Design Policies:

I am fully supportive of Design Policies D1”Making better places”, D2 Sustainable design, construction and energy” and D3 “Historic Environment”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13897  Respondent: 15598113 / David J. Blackbourn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Economic Policies: I am in support of Policy E1 “Sustainable employment”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

But believe that Policy E2 “Location for new employment floorspace” fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am supportive of Policy E4 “Surrey Research Park”, Policy E5 “Rural Economy” and Policy E6 “The leisure and visitor experience”

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): ()

but caution that Policy E7 “Guildford Town Centre” could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13893  Respondent: 15598113 / David J. Blackbourn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing Policies: Policy H1 “Homes for all” suffers from the inclusion of an unacceptable requirement to impose on the University (regardless of Blackwell Farm) an obligation to provide accommodation for 60% of its students on campus. This imposition will limit education and will create a “them and us” style society. The housing problem in Guildford is not caused by students or the University and the Town should not discriminate against them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13895  Respondent: 15598113 / David J. Blackbourn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2 “Affordable Homes” imposes a high obligation on developers for affordable housing but makes no reference to viability. If we are unrealistic about expectations of what developers must provide it will limit the supply of new homes and increase the cost of those that are built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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**Infrastructure Policies**: The infrastructure policies are sensible. Policy I3 “Sustainable transport for new developments” and Policy I4 “Green and blue infrastructure” are important and I support each of them. Blackwell distinguishes itself in each of these areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Protecting Policies**: The Protecting Policies P1 “AONB”, P2 “Green Belt” and P3 “Countryside” are supported.

**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 S2</td>
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</table>
Strategic Policies: The strategic policies within the plan are sensible. Development must be sustainable and respect natural assets; it must also include some careful use of greenbelt land for the simple reason that there is not enough developable capacity in brownfield sites. I therefore support both Policy S1 “Sustainability” and Policy S2 “Housing number”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3415  
Respondent: 15598209 / Peter Unsworth  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6638  
Respondent: 15598241 / Madeleine Hewish  
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?

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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>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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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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</table>
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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Comment ID: PSLPP16/13917  Respondent: 15598241 / Madeleine Hewish  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 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: PSLPP16/13912  Respondent: 15598241 / Madeleine Hewish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

This is an extremely beautiful area. Removal from the green belt will cause the local tourist trade to suffer significantly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/13914  Respondent: 15598241 / Madeleine Hewish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13915</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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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. All adults will require a car. This will lead to unacceptable levels of congestion and a significantly reduced quality of life for all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

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?
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?

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?
**Comment ID:** PSLPS16/6651  **Respondent:** 15598721 / Trevor Ottaway  **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):** ()

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.

**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:**

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Garlick’s Arch is protected from development as Green Belt. There are **no exceptional circumstances** which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is **not** an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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
- 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: PSLPP16/13970  Respondent: 15598721 / Trevor Ottaway  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 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: PSLPP16/13966  Respondent: 15598721 / Trevor Ottaway  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 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:
There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13971  Respondent: 15598721 / Trevor Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13973  Respondent: 15598721 / Trevor Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.</td>
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<tr>
<td>I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.</td>
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<td>The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).</td>
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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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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:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3425</th>
<th>Respondent: 15598817 / Paul Quy</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</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 proposed Infrastructure Schedule - (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends upon. I am shocked to learn that there is no such schedule for Garlick's Arch (A43) which indicates to me that the Plan takes no account of the infrastructure that is required for this site. This cannot be tenable and is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3424  Respondent: 15598817 / Paul Quy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the figure of 693 houses per annum in the borough being too high - (Appendix D)

The Plan's proposed growth is based on the SHMA report which says that 693 homes per year are required by the borough, which is more than double the figure of 322 used in previous plans.

However, as the council with not publish the SHMA report, this figure cannot be independently verified. This lack of transparency is farcical and disables fair consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6654  Respondent: 15598817 / Paul Quy  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 due to it's Green Belt status. There are no exceptional circumstances which allow it's removal from the Green Belt (Policy P2) - Central Government clearly state that the need for new housing is not an exceptional circumstance.

The Plan clearly states the preference is to use previously developed land, but Guildford Borough Council have removed a brownfield site at Burnt Common, and replaced this with Garlick's Arch.
The Garlick's Arch is not appropriate because:

- there is no sustainable transport infrastructure
- the site is liable to frequent flooding
- it contains ancient woodland and is a wildlife habitat - yet there is no wildlife report for the site in the Plan
- there are no plans to increase local school places or local medical services, or any plans to improve local utilities in order to meet the additional demand from these new houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13977  Respondent: 15598817 / Paul Quy  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 sheer scale of this proposed development - (Policy D3)

The Garlick's Arch (A43) proposal would double the built area in the locality, and I fear this would irrevocably damage the character of Ancient Woodland located here, 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: PSLPP16/13975  Respondent: 15598817 / Paul Quy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object due to the congestion that this development will cause to the local village roads and the lack of road infrastructure - (Policy I1)

There is already too much traffic in our villages - Ripley is a point in case - traffic cutting through Ripley from Junction 10/A3 to get across towards Pyford/Woking via Newark Lane (B367) means tailbacks already stretch back along the Portsmouth Road (B2215) to the roundabout under the Ripley Bypass (A3). There are no plans to improve issues like this. Rural roads in this area are narrow, in poor condition and have no footpaths - with 5000 more homes this means dangerous conditions particularly for cyclists, pedestrians/walkers and children in the area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/13979  Respondent: 15598817 / Paul Quy  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 for sites - (Policy I1)
The Plan does not identify adequate infrastructure improvements that support the huge scale of the proposed development, particularly at Garlick's Arch (A43) - it has no infrastructure projects within the Infrastructure Schedule to support this.

Having lived in the area for 17 years, I can vouch for the fact that Local Services, Utilities & Sewerage, Doctors and medical facilities are all at, or very near capacity - a further influx of residents on the scale proposed would place incredible strain on these already-stretched services.

I also further understand that there are no plans to improve the capability of the medical and Police/Emergency services to cover this additional influx of residents in some 5,000+ houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/13980  Respondent: 15598817 / Paul Quy  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)
Given the scale of development planned, the A3 and M25 would have to be improved before any such development is done. Highways England have no plans to even start considering improvements to the A3 until at least 2020. Clearly, no tangible improvements will be possible in the timeframe of this Plan and so developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) simply should take place.
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: PSLPP16/13978</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 poor Air Quality concerns - (Policy I3)

These huge developments that are being planned particularly here in the NE of the borough will clearly add to the current traffic congestion and further contribute to greater levels of pollution which are bound to have a detrimental effect on local residents and the health of their families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the Plan as it does not protect the Green Belt - (Policy P2)

I object to the removal of Ripley, Send and Clandon from the Green Belt, along with the sites of Garlick’s Arch (A43) and Wisley Airfield (A35) and the subsequent urban sprawl that threatens them. There are no exceptional circumstances that warrant the removal of these villages and sites - as required by the National Planning Policy.

It is therefore logical for the Plan to develop the existing brownfield site at Burnt Common rather than Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/13972  **Respondent:** 15598817 / Paul Quy  **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 it is simply not sustainable - (Policy S1)

Over-development of our area will heavily impact Ripley, Send and Clandon, due to the sheer number of houses proposed - (13,860). Both Garlick's Arch (A43) and the old Wisley Airfield (A35) have no accessible train stations as well as inadequate local bus services. It is therefore inevitable that there will be many more cars used in the area. Additionally, the Plan contains nothing that will improve infrastructure to improve Garlick's Arch. It therefore makes more sense for this development to be sited in urban areas where sustainable transport links are already in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13976  **Respondent:** 15598817 / Paul Quy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with 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)

Guildford Borough Council's proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from the plans of all the other Borough Councils in Surrey.

The Plan shows great imbalance across the borough with too much development in the North-East of the borough (Wisley A35), Ripley/Send (A43) and Clandon (A25) - a staggering 36% of all the Plan's new housing is proposed in this area which currently has only 11% of the existing housing.

I am very concerned that 5,036 new houses proposed between the M25 and Burpham (a distance of about 5 miles in total) will obviously lead to merged urbanisations that will engulf our villages and wipe away our identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13982  **Respondent:** 15598945 / Jon Fairclough  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of 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 and Ripley will be removed from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13983 | Respondent: 15598945 / Jon Fairclough | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Too many new houses in East Horsley/Ripley/Ockham/Wisley area compared with the number existing already

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13987 | Respondent: 15599009 / Alison J Young | 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 amenities and infra structure of the Horsleys are all ready either under pressure or at capacity.

The Raleigh school is full with no room for expansion. In a high birth rate entry year not all children in the Horsleys can be accommodated at the school.

In view of the building of a new Howard of Effingham school being rejected and the existing school being full to capacity, there will not be enough local secondary school places for local children if the plan goes ahead.
The roads are already busy in the Horsleys with queues developing on the A246 and along Ockham Road South where it joins the A246 in peak periods. The proposed development at the hotel site, adjacent to dangerous bends on the A246, particularly concerns me. An additional junction here at an already busy and dangerous location will only exacerbate the situation.

Parking at East Horsley village shops is already congested and at times it is impossible to find a parking space. Increased inhabitants in the Horsleys will increase pressure on parking still more.

The medical centre seems routinely unable to offer an appointment for up to a fortnight, so an increased population will no doubt extend waiting times.

Based on these points I object to the proposed 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: PSLPP16/13998  Respondent: 15599105 / Ryan McQuade  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): ()

Thirdly is that it will make it an awful lot harder for me to get jobs as well as other younger people in Horsley, which means we will just be pign elsewhere due to a lack of jobs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13997  Respondent: 15599105 / Ryan 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): ()

Secondly, is that the local amenieties like Budgens and the taekaways, and even the hairdressers wont be able to deal with the amount of people being brought to the village, and therefore may go elsewhere affecting these companies profit margins.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Fourthly local schools own't be able to deal with the sheer weight of new students and therefore could have to reject potential students. Finally Thames water has advised the council that the current wastewater network in the area is unlikely to be able to support the extra houses causing an upgrading costing thr local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am writing to object to the proposed Guildford plan 2016. Listed are my reasons why.

The first reason is that if the proposed number of houses is built, the traffic and danger to me walking around horsley is heavily increased due to the traffic and number of cars on the road.

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): ()

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 its 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:

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<th>Comment ID:</th>
<th>PSLPP16/14008</th>
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<th>15599201 / Marlies Colborne-Barber</th>
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<td>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): ()

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. It is a joke!!!

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 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:**

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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 massive overdevelopment of the green belt at Gosden hill farm and also any in-setting of our villages from the Green Belt. There are no infrastructures to support these developments, Ripley itself has no secondary school and all local schools in the vicinity are at breaking point.</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>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I am a resident of Ripley Surrey, I object to the local planned development as it is not sustainable. I also object to the A35 Wisley Airfield development as it is inappropriate and unsustainable. Traffic through Ripley is difficult enough to get through without additional cars. We also have a speeding problem throughout the village, the high street should have speed cameras. I don’t have any young children but I am really scared when I watch young children try to reach the other side of the road to go to school. I do not know how there has not been a serious accident.</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>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>
I object to site A43a the proposed on off ramp at burnt common as this will again only increase traffic in villages. Our villages are being changed and as our local council I would have expected you to want to preserve our rural way of life. Guildford itself is losing its attractiveness as an historical town and will shortly be unrecognisable if any of the proposed large developments go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14016  Respondent: 15599297 / Janice Mcouat  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 it takes two to three weeks to see a doctor at the local doctors surgery, we don’t need any additional housing of this scale in our villages. I object to Guildford council alleged housing need numbers when they fail to produce any undeniable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/5  Respondent: 15599297 / Janice Mcouat  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): ()

I live on Ripley High Street and I want to register my objections to items mentioned in the latest local plan.

We currently have a monumental problem at present with traffic going through Ripley village. The proposed increase in housing at Garlicks Arch, Wisley and Tannery Lane will only make the situation worse.
I also object to the plan for 6 travelling show people plots on green belt land as it is a rural environment and totally wrong for the area and this again would lead to increased traffic. Our local roads are too small for this congested traffic.

I think Guildford borough council are hell bent on destroying our village with misconceived and ill thought out plans, it is time the planning officials started listening to residents of our local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/14017</th>
<th>Respondent: 15599329 / Luke Attfield</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 would like to register my objection to this proposal as it would ruin the local environment. Having studied at school the impact of large numbers of people on the areas such as the ones in the proposed villages this plan is not sustainable and would cause a lot of congestion on the roads, trains and emergency services.

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): ()

There has already been a lot of new building in this village and there is no reason for more houses to be built in the locality as it is already full.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 3348.